

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
AMI HOROWITZ,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Civil Case No. 1:25-cv-3412
	:	
AJP EDUCATIONAL FOUNDATION,	:	
INC. d/b/a AMERICAN	:	
MUSLIMS FOR PALESTINE and	:	
NATIONAL STUDENTS FOR JUSTICE	:	
IN PALESTINE,	:	
	:	
Defendants.	:	
	:	
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COMPLAINT

Plaintiff Ami Horowitz (“Horowitz”) hereby sues Defendants AJP Educational Foundation d/b/a American Muslims for Palestine (“AMP”) and National Students for Justice in Palestine (“NSJP”) as follows:

INTRODUCTION

1. On April 26, 2024, Plaintiff Ami Horowitz was mobbed and beaten by radical terror supporters at the “Gaza Solidarity Encampment” occupying the City College of New York’s campus. His offense was walking while holding an American flag.

2. This case is about holding accountable the national organizers of the violent pro-terror movement that used these protestors as its attack dogs: ordering them to create the encampment, assisting them with its set up, organizing and mobilizing them to violently “defend” the encampment against perceived “threats,” and systematically encouraging and supporting them

in violent acts, like the attack against Horowitz, and then protecting them from consequences for doing so.

3. Defendant AMP was founded for the direct purpose of serving Hamas's political aims in the United States: to coerce and pressure American civil society for the benefit of a genocidal terrorist organization that has kidnapped and murdered innocent American civilians.

4. Defendant NSJP is AMP's on-campus brand, a project created to manage and control a network of chapter and affiliate organizations across hundreds of campuses on behalf of AMP so that they can be used for disrupting, agitating, and shutting down schools as AMP deems necessary to serve Hamas's aims.

5. Following Hamas's terror attack against Israel on October 7, 2023, AMP and NSJP executed a nationwide strategic plan to pressure colleges and universities into capitulating to their pro-Hamas demands of divesting from and boycotting Israel and demanding that the United States withdraw its support from Israel. AMP and NSJP used NSJP's network of hundreds of chapters and affiliates as their agents to coerce schools through disruptive, antisemitic, and violent protest actions.

6. In April 2024, AMP and NSJP escalated to their largest operation to date: coordinating, guiding, and commanding NSJP's network to engage in an "uprising" by using encampments to seize control of their campuses and halt school function until NSJP's pro-Hamas demands were met.

7. The protestors who attacked and beat Horowitz for holding an American flag on a public college campus funded by American taxpayers were members of NSJP's chapters and affiliates at the City University of New York ("CUNY") and Columbia University. Their attack on Horowitz was just one of many acts of violence they and NSJP's other chapters and affiliates

carried out as part of their “protests” and encampments, operating on AMP and NSJP’s orders and with their support, coordination, encouragement, and protection.

8. The violence against Horowitz by NSJP’s chapters and affiliates at the CUNY encampment was not just some regrettable, unintended excess or exception to the rule: it was the direct result and purpose of AMP and NSJP’s systematic campaign of organizing, mobilizing, coordinating, funding, guiding, encouraging, and supporting violent protest by NSJP’s campus organizations. Violence like the attack on Horowitz is part of AMP and NSJP’s design: at every turn, AMP and NSJP have celebrated and encouraged violence by NSJP’s chapters and affiliates, including directing them to engage in attacks and physical “resistance” against law enforcement and other “threats” to the encampments.

9. Without AMP and NSJP’s direction and support for NSJP’s chapters and affiliates and their violent activities, there would have been no encampment at CUNY and there would have been no attack on Horowitz for holding an American flag. The attack on Horowitz was a direct result of AMP and NSJP’s systematic command and control over NSJP’s network of chapters and affiliates and use of them to violently shut down campuses and attack their perceived enemies. AMP and NSJP are thus liable for causing and supporting the attack on Horowitz and must compensate him for his harm accordingly.

JURISDICTION AND VENUE

10. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1332 because the parties are citizens of different states and the amount in controversy exceeds \$75,000. Plaintiff Horowitz is a citizen of New York. Defendant AMP is a nonprofit corporation incorporated in California with its principal place of business in Virginia. Defendant NSJP is an unincorporated

association without a formal principal place of business operated by AMP. On information and belief, it has no physical operation and no place of business.

11. This Court has personal jurisdiction over Defendants AMP and NSJP because their wrongful conduct giving rise to the current litigation occurred in New York, New York and was directed to conduct in New York, New York.

12. Venue is proper in this Court under 28 U.S.C. § 1391(b)(2) because a substantial part of the events giving rise to the claim occurred in New York, New York.

PARTIES

13. Plaintiff Horowitz is a documentarian and civil rights activist with a focus on anti-Semitism. Horowitz has created several documentaries on anti-Semitism in higher education, one of which influenced the enactment of Executive Order 13899 Combatting Anti-Semitism.

14. Defendant AMP is a 501(c)(3) nonprofit corporation incorporated in California with its principal place of business in Falls Church, Virginia.

15. Defendant NSJP is an unincorporated association without a formal place of business or publicly identified leadership structure that was created and is operated by AMP to manage and control a network of hundreds of chapter and affiliate organizations on campuses. It intentionally hides its leadership, management, employees, officers, directors and members, and either lacks or hides any physical location.

STATEMENT OF FACTS

I. Overview of the foreign terrorist organization Hamas and its influence operations within the United States.¹

A. Overview of Hamas.

16. Defendants AMP and NSJP are entities designed to further the political goals of Hamas and its allies in the global Islamist movement—including Iran—within the United States.

17. Hamas was founded in 1987 during the “First Intifada.” The First Intifada was a terrorist military operation directed at Israeli civilians and consisted of a string of terrorist attacks that took the lives of hundreds of Israelis and wounded thousands more. During the First Intifada, the Gaza branch of the international terrorist organization the Muslim Brotherhood split off into an independent organization, thus creating Hamas.²

18. Hamas is a designated terrorist organization that was founded to genocidally eliminate Jews from the land of Israel and rejects the legitimacy of secular Arab or Palestinian rule—recognizing only its own Islamist governance, backed by violent repression, as legitimate.³ Hamas engages in, directs, and supports terrorism as part of its goal of destroying Israel, murdering the Jews who live there, and installing an Islamic state under Sharia law from the Jordan River to the Mediterranean Sea—the origin of the “From the River to the Sea!” chant that Hamas and its

¹ The allegations in this section are largely related to the allegations in First Amended Complaint, *Boim v. Am. Muslims for Palestine*, No. 1:17-cv-3591 (N.D. Ill. Dec. 17, 2019), ECF 179; Complaint, *Parizer, et al. v. AJP Educational Foundation Inc., et al.*, No. 1:24-cv-274 (E.D. VA May 1, 2024); and Complaint, *Haggai v. Kiswani*, No. 1:25-cv-2400 (S.D.N.Y. Mar. 24, 2025). These matters are ongoing. The Seventh Circuit has already concluded that the allegations in *Boim* state a plausible and actionable claim for relief based on the theory that AMP is an alter ego for the original material support enterprise for Hamas described below. *See Boim v. Am. Muslims for Palestine*, 9 F. 4th 545, 554-56 (7th Cir. 2021).

² Kali Robinson, *What is Hamas?*, COUNCIL ON FOREIGN RELATIONS (last updated Oct. 17, 2024), <https://www.cfr.org/background/what-hamas>.

³ *See generally The Covenant of the Islamic Resistance Movement*, Hamas (Aug. 18, 1988), https://avalon.law.yale.edu/20th_century/hamas.asp.

supporters rally around in proclaiming their intent to violently expel Jews from the territory of Israel.⁴

19. Hamas was designated as a foreign terrorist organization (“FTO”) by the U.S. State Department in 1997; its FTO status was reaffirmed in 1999 and 2001.⁵

20. To further its goal of the genocidal destruction of Israel and Jews and Israel’s replacement with an Islamist totalitarian state, Hamas engages in terrorism, propaganda, and lies to demonize Israel and Jews and to cast itself as a justified “resistance” of victims nobly standing up to Israel and the Jews as a “settler-colonial” oppressor.⁶

21. Leading up to and following Hamas’s terrorist attack against Israel on October 7, 2023, Hamas was funded, trained, and controlled in large part by the Islamic Republic of Iran’s Islamic Revolutionary Guard Corps (“IRGC”), which is itself a FTO.⁷ The IRGC was a direct participant in Hamas’s October 7th attack, funding, training, and equipping Hamas and Palestine Islamic Jihad and assisting the preparation and organization of the attacks.⁸

B. The history of Hamas’s influence operations in the United States.

22. Hamas’s influence operation within the United States started with the creation of the “Palestine Committee” by the Muslim Brotherhood in 1988 as a funding enterprise in the

⁴ “From The River To The Sea,” American Jewish Committee, (last visited Apr. 10, 2025), <https://www.ajc.org/translatehate/From-the-River-to-the-Sea>; Slogan: “From The River To The Sea Palestine Will Be Free,” Anti-Defamation League (Oct. 26, 2023), <https://www.adl.org/resources/backgrounders/slogan-river-sea-palestine-will-be-free>.

⁵ See CRS Report for Congress, Foreign Terrorist Organizations 27-30 (Feb. 6, 2004), <https://irp.fas.org/crs/RL32223.pdf>.

⁶ Daniel Byman & Emma McCaleb, *Understanding Hamas’s and Hezbollah’s Uses of Information Technology*, Center for Strategic & International Studies (July 31, 2023), <https://www.csis.org/analysis/understanding-hamass-and-hezbollahs-uses-information-technology>.

⁷ *Hezbollah, Hamas, and More: Iran’s Terror Network Around the Globe*, American Jewish Committee (Jan. 29, 2024), <https://www.ajc.org/news/hezbollah-hamas-and-more-irans-terror-network-around-the-globe>.

⁸ Matthew Levitt, *The Hamas-Iran Relationship*, The Washington Institute For Near East Policy (Nov. 2023), <https://www.washingtoninstitute.org/policy-analysis/hamas-iran-relationship>; Summer Said et al., *Iran Helped Plot Attack on Israel Over Several Weeks*, Wall Street Journal (Oct. 8, 2023), <https://www.wsj.com/world/middle-east/iran-israel-hamas-strike-planning-bbe07b25>.

United States for supporting Hamas's terrorism.⁹ "The Committee's goal included 'increasing the financial and the moral support for Hamas,' 'fighting surrendering solutions,' and publicizing 'the savagery of the Jews.'" ¹⁰ This early funding enterprise consisted of a network of organizations run by pro-Hamas activists without regard for corporate form or legal requirements.

23. These activists directly coordinated with Hamas to help advance its political goals in the United States. In a 1993 wiretapped meeting between members of the Palestine Committee and Hamas about how to improve the Committee's activities in support of Hamas within the U.S. while shielding them from the consequences of Hamas's designation as a terrorist organization, U.S.-based Hamas activists agreed that the Committee's members hiding their affiliation with Hamas was the best tactic for achieving their ends:

I swear by Allah that war is deception. We are fighting our enemy with a kind heart. ... Deceive, camouflage, pretend that you're leaving while you're walking that way. Deceive your enemy.¹¹

The parties agreed that the Palestine Committee's member groups would remain in relative stealth to obfuscate their goals while ensuring their continued operation:

Let's not hoist a large Islamic flag and let's not be barbaric-talking. We will remain a front so that if the thing [the U.S. Government ban on Hamas] happens, we will benefit from the new happenings instead of having all of our organizations classified and exposed. I was telling our brother ... about Al Aqsa Organization. Why Al Aqsa Educational? When you go to Oxford, they will ask you: 'Sir, what is Aqsa?' Make it the "Palestinian General Education Academy.' Make yourself a big name like that and give it a media twinkle and there is no need for Al Aqsa, Al Quds, Al Sakhra and all that stuff.¹²

⁹ Lorenzo Vidino, *The Hamas Networks in America: A Short History*, Program on Extremism at George Washington University, at 5, 7–8 (Oct. 2023), <https://extremism.gwu.edu/sites/g/files/zaxdzs5746/files/2023-10/hamas-networks-final.pdf>.

¹⁰ *Id.* at 5.

¹¹ *Id.* at 12.

¹² *Id.* at 5.

24. The Palestine Committee consisted of several organizations, including the Holy Land Foundation for Relief and Development (“HLF”), the Islamic Association for Palestine (“IAP”), and IAP’s alter egos, such as the American Muslim Society (“AMS”). HLF’s role was to fundraise for Hamas within the United States, while IAP’s role was to serve as the “primary organization providing political and ideological support for Hamas in the US.”¹³

25. HLF and IAP were founded and led by senior members of Hamas and their relatives.¹⁴ IAP was founded by Khaled Mashal, the current Acting Chairman of the Hamas Political Bureau¹⁵ and was financed by Mousa abu Marzook, a “Specially Designated Global Terrorist.”¹⁶

26. The United States Office of Foreign Asset Control designated HLF a “Specially Designated Global Terrorist” in 2001.¹⁷ In 2008, HLF and five of its leaders were convicted of providing material support to Hamas.¹⁸ IAP was dissolved in 2004 after one of its alter egos was held civilly liable for funding Hamas in violation of the Antiterrorism Act.¹⁹

¹³ *Hamas’s Influence on US Campuses*, Program on Extremism at George Washington University 15 (2024), https://extremism.gwu.edu/sites/g/files/zaxdzs5746/files/2024-11/Pamphlet_compressed.pdf.

¹⁴ Vidino, *supra* note 9 at 7-8.

¹⁵ *Id.* at 8; *Head of Hamas Abroad Khaled Mashal: Only Jihad Will Restore Our Rights*, MEMRI (Mar. 10, 2025), <https://www.memri.org/tv/khaled-mashal-hamas-abroad-jihad-resistance-battlefield>.

¹⁶ *Sanctions List Search: Mousa Abu Marzook a/k/a Abu Omar, Abu Umar, Abu Rizq*, Office of Foreign Asset Control, <https://sanctionssearch.ofac.treas.gov/Details.aspx?id=3754>.

¹⁷ See Press Release, U.S. Department of Justice, Federal Judge Hands Down Sentences in Holy Land Foundation Case (Mar. 27, 2009), <https://www.justice.gov/opa/pr/federal-judge-hands-down-sentences-holy-land-foundation-case>.

¹⁸ *Id.*; *From Ivory Towers to Dark Corners: Investigating the Nexus between Antisemitism, Tax-Exempt Universities, and Terror Financing: Hearing before the House Committee on Ways and Means*, 118 Cong. (2023) (statement of Dr. Jonathan Schanzer at 3, 5), <https://www.congress.gov/118/meeting/house/116589/witnesses/HHRG-118-WM00-Wstate-SchanzerJ-20231115.pdf>.

¹⁹ See *Boim v. Holy Land Found. for Relief & Dev.*, 549 F.3d 685, 701 (7th Cir. 2008).

C. History of AMP as the successor to the Palestine Committee’s support enterprise for Hamas.

27. After the Palestine Committee’s support network for Hamas was exposed and its utility to Hamas was hampered, its organizers restructured their efforts to be more effective. In 2006, several of the network’s head organizers founded AMP as a successor effort to IAP to continue their propaganda and other support for Hamas in the United States: there is “significant overlap between AMP and people who worked for or on behalf of organizations that were designated, dissolved, or held civilly liable by federal authorities for supporting Hamas.”²⁰

28. Hatem Bazian is the founder and chairman of AMP. Before creating AMP, Bazian served as a speaker and fundraiser for the Palestine Committee. Bazian also created the original Students for Justice in Palestine (“SJP”) chapter in 1993 while working as a professor at the University of California at Berkeley.²¹

29. Bazian has a long history of support for Islamist radicalism, frequently collaborating with IAP and fundraising for KindHearts—another front for providing support for FTOs and fundraising for Hamas connected with HLF²²—before they were dissolved.

30. AMP’s executive director and national board member, Osama Abuirshaid, is the former editor of IAP’s newspaper²³ and has extensive connections to terrorists and terrorist

²⁰ *Israel Imperiled: Threats to the Jewish State: Joint Hearing before the Subcomm. on Terrorism, Nonproliferation, and Trade & the Subcomm. on the Middle East and North Africa*, 114 Cong. 156 (2016) (statement of Jonathan Schanzer at 2-3), <https://docs.house.gov/meetings/FA/FA18/20160419/104817/HHRG-114-FA18-Wstate-SchanzerJ-20160419.pdf?ref=stanfordreview.org>.

²¹ Eitan Fischberger, *The Long March of Radicalization*, City Journal (Oct. 16, 2023), <https://www.city-journal.org/article/the-long-march-of-radicalization>.

²² Vidino, *supra* note 9 at 15.

²³ Osama Abuirshaid, Canary Mission (last visited Apr. 8, 2025), https://canarymission.org/individual/Osama_Abuirshaid; *From Ivory Towers to Dark Corners: Investigating the Nexus Between Antisemitism, Tax-Exempt Universities, and Terror Financing*, Hearing before the House Ways and Means Committee, 118th Congress (2023) (statement of Dr. Jonathan Schanzer at 9), <https://gop-waysandmeans.house.gov/wp-content/uploads/2023/11/Schanzer-Testimony.pdf>.

organizations, making a career of running propaganda for them: he has interviewed Hamas leadership,²⁴ been featured in media of Hamas's military wing, the al-Qassam Brigades,²⁵ spoken alongside terrorists at a conference, including convicted airplane hijacker Leila Khaled, Hamas co-founder Sami Khater, and Hamas senior official and Specially Designated Global Terrorist Mohammad Nazzal.²⁶ Abuirshaid regularly travels to Turkey to meet and confer with Sami Al-Arian, who pled guilty in 2006 to providing support to another FTO allied to Hamas in Gaza, Palestinian Islamic Jihad.²⁷ He also regularly travels to Qatar, where he is a "non-resident scholar" for the Arab Center for Research and policy Studies, an organization funded by the Qatari government that hosts Hamas's top leaders—including Hamas leaders Khaled Meshal and Osama Hamdan—at its events.²⁸

31. AMP operates in the manner of a conspiracy, using a network of controlled and allied organizations to obscure its activities and make tracing its activities and holding them accountable difficult. Due to this mode of conspiratorial operation—similar to the fluid

²⁴ Osama Abuirshaid, *The Dialectic of Religion and Politics in Hamas's Thought and Practice* 28-30 (March 22, 2013) (Ph.D. thesis, Loughboro University) (available here: https://repository.lboro.ac.uk/articles/thesis/The_dialectic_of_religion_and_politics_in_Hamas_thought_and_practice/9466799?file=17090657).

²⁵ Statement of Dr. Jonathan Schanzer, *supra* note 23 at 9.

²⁶ *Head of Palestinian American lobby group joins conference with terror-group members*, Jewish News Syndicate (Dec. 3, 2021), <https://www.jns.org/head-of-palestinian-american-lobby-group-joins-conference-with-terror-group-members/>; Press Release, Department of the Treasury, Treasury Targets Key Hamas Leaders and Financiers (Nov. 19, 2024) ("[Nazzal] is a Hamas official who has provided support to the terrorist group for over 30 years. As a senior leader serving on Hamas's Council on International Relations, Nazzal represents Hamas's interests to a variety of international audiences."), <https://home.treasury.gov/news/press-releases/jy2720>.

²⁷ See @JSchanzer, X (May 5, 2024, 10:04 AM), <https://x.com/JSchanzer/status/1787121140311171531>; Statement of Dr. Jonathan Schanzer, *supra* note 23 at 9; Press Release, U.S. Department of Justice, Sami Al-Arian Pleads Guilty To Conspiracy To Provide Services To Palestinian Islamic Jihad (Apr. 17, 2006), https://www.justice.gov/archive/opa/pr/2006/April/06_crm_221.html.

²⁸ Statement of Dr. Jonathan Schanzer, *supra* note 23 at 9; *In a Symposium Preceding Conference on the Palestinian Cause, Hamdan: "The Resistance Continues"*; Erekat: "Negotiations Will Never Relinquish Palestinian Justice," Arab Center for Research & Policy Studies (Dec. 7, 2023), https://www.dohainstitute.org/en/News/Pages/In_a_Symposium_Preceding_Conference_on_the_Palestinian_Cause_Hamdan_The_Resistance_Continues;Erekat_Negotiations_Will_Nev.aspx.

interrelationships and overlap between the groups compromising the Palestine Committee—it is difficult to determine which of AMP’s allied and collaborating organizations are bona fide independent entities which merely works alongside AMP and which are partially or wholly under its control or otherwise part of a centrally-run joint endeavor. The network of AMP’s collaborators and potentially overlapping organizations includes, but is not limited to, Palestinian Youth Movement, Within Our Lifetime, Jewish Voice for Peace, The People’s Forum, Palestine Legal, Dissenters, Answer Coalition, U.S. Campaign for Palestinian Rights, American Friends Service Committee, and Palestinian Feminist Collective.

32. Though now apparently a formally unified organization, as described below, AMP was initially two legally distinct though interrelated organizations: American Muslims for Palestine and Americans for Justice in Palestine Educational Foundation, Inc (“AJP”). As part of a strategy to operate without public financial transparency while also taking in tax-deductible donations, American Muslims for Palestine used AJP as its fiscal sponsor, with their separation being only nominal. The organizations shared an identical leadership structure and principal place of business in Falls Church, Virginia; Hatem Bazian serves as the president of AJP and chairman of American Muslims for Palestine; Osama Abuirshaid serves as a director of AJP and the executive director of American Muslims for Palestine; and Salah Sarsour and Shakeel Syed serve as directors of both AJP and American Muslims for Palestine.

33. American Muslims for Palestine and AJP’s operations overlap to the point that the Commonwealth of Virginia considers AMP to be the “doing business as” name for AJP. In October 2023, Virginia began investigating “AJP Educational Foundation, Inc., also known as American Muslims for Palestine” for “potential violations of Virginia’s charitable solicitation laws,”

including benefitting or providing support to terrorist organizations.”²⁹ American Muslims for Palestine and AJP appear to have since formally merged their operations, with American Muslims for Palestine soliciting donations using AJP’s EIN number, and AJP’s affiliated 501(c)(4) organization, AJP Action, directly identifying American Muslims for Palestine as the fictitious name for AJP.³⁰ In March 2025, the Senate Committee on Health, Education, Labor, and Pensions began its own investigation into AMP and its connection to AJP and campus SJP groups, with a letter from the Committee Chair Senator Bill Cassidy requesting Bazian explain the relationship between AMP, AJP, and NJSP and specific of its chapters.³¹

²⁹ See News Release, Office of the Virginia Attorney General, Attorney General’s Office Opens Investigation Into American Muslims for Palestine Nonprofit (Oct. 31, 2023), <https://www.oag.state.va.us/media-center/news-releases/2630-october-31-2023-attorney-generals-office-opens-investigation-into-american-muslims-for-palestine-nonprofit>.

³⁰ *Our Story*, AJP Action (last visited Apr. 9, 2025), <https://ajpaction.org/services/ourstory/> (“AJP Action was founded in 2021 as an affiliated organization of AJP Educational Foundation, Inc., which does business as [American Muslims for Palestine](#) (AMP). AMP was founded in 2006 to educate and organize the Muslim community to take action for Palestinian rights. AMP also advocated for Palestinian rights on Capitol Hill within the limits available to a 501(c)(3) organization.”).

³¹ Michael Starr, *US Senate committee investigating AMP for alleged Hamas connections*, The Jerusalem Post (Mar. 30, 2025), <https://www.jpost.com/diaspora/antisemitism/article-848086>.

D. The history of NSJP as AMP's arm for pro-Hamas campus activities.

34. To solidify and extend its control over the campus radical movement in favor of Hamas, AMP sponsored the first SJP National Convention in 2010. AMP's goal was to unite and organize the various SJP chapters on college campuses across the country under its direction. At the convention, AMP announced National Students for Justice in Palestine ("NSJP"), its project to control the management, financing, messaging, training, and activities of SJP chapters across the United States and beyond.³² Though some SJP chapters chose to remain formally unaffiliated, they continued to receive aid and material support from NSJP, particularly for protest activities, messaging, and connection to resources like training materials and legal aid.

35. This SJP National Convention was held at Columbia,³³ the location of NSJP's flagship chapters and affiliates. NSJP's chapters and affiliates at Columbia are among its most radical and violent and have been used by NSJP as a model for its other chapters and affiliates to emulate and as the spearhead and developmental laboratory for NSJP's most illegal, violent, and disruptive campaigns, particularly NSJP's operation to violently take over college campuses through unlawful encampments.

36. NSJP has no formal corporate structure or independent legal existence of its own, operating as AMP's project and primary brand for its operations aimed at college campuses. AMP is the manager, controller, and operator of NSJP.

³² Charles Asher Small et al., *Antisemitism Violent Extremism and the Threat to North American Universities: The Contextualization of the National Students for Justice in Palestine*, Institute for the Study of Global Antisemitism and Policy, at 12 (Oct. 2019), <https://isgap.org/wp-content/uploads/2019/10/NSJP-2019-ISGAP-Report-Long-Version.pdf>.

³³ *Students for Justice in Palestine (SJP)*, Anti-Defamation League (last visited Mar. 23, 2025), <https://www.adl.org/resources/backgrounder/students-justice-palestine-sjp>.

37. The network of chapters and affiliated organizations that AMP and NSJP lead, train, support, and direct is vast and encompasses groups with a variety of names, extending beyond only those organizations that formally have “Students for Justice in Palestine” in their name, including groups such as Students Against Israeli Apartheid, Students United for Palestinian Equal Rights, Dissenters, and Students for a Democratic Society.³⁴ AMP and NSJP’s purpose in maintaining, leading, supporting, and directing this network is to continue the work of AMP’s predecessors in the Palestine Committee and conduct operations to influence and coerce American civil society in service of Hamas and its allies.

38. While NSJP and its chapters and affiliates make claims that NSJP’s chapters and affiliates are independent of NSJP, this is a fiction intended to further AMP and NSJP’s operations by obfuscating their responsibility and liability for NSJP’s chapters and affiliates’ actions. AMP and NSJP maintain centralized command and control over NSJP’s chapters and affiliates, which includes AMP and NSJP centrally providing marching orders, propaganda and talking points, resources for financing, training, and organizing operations, legal and public relations cover, and coordination with outside allied organizations for NSJP’s chapters and affiliates’ protests, encampments, and other operations. AMP uses NSJP as the ringleader and control organ for its campus chapters and affiliates, which individually and together serve as its agents for serving the interests of Hamas and its allies on campuses across the United States and elsewhere.

39. To assist with hiding their role in ordering, coordinating, supporting, and leading NSJP’s network of chapters and affiliates, AMP and NSJP use encrypted messaging apps and

³⁴ See Exhibit A at 4 (National Divestment Campaign Chapter Intake Form). NSJP’s role in directly providing resources, training, and “backlash support” for a wide variety of chapters and affiliates—including on an “emergency” basis within less than 48 hours—is reflected in NSJP’s intake forms for its “Campus Support Coalition.” See Exhibit B at 1, 6-7, 10 (Campus Support Coalition Intake Form).

communication services.³⁵ Learning from AMP and NSJP's example, NSJP's individual chapters and affiliates often operate internally through these methods as well, particularly when planning, organizing, and perpetrating violent, illegal activity.

40. As part of AMP's effort to hide its activities and operate conspiratorially, AMP also relies on the Westchester People's Action Committee Fund ("WESPAC"), a New York-based nonprofit organization, to assist with obfuscating its financing. WESPAC serves as NSJP's "fiscal sponsor," receiving and administering donations made to NSJP. WESPAC keeps a percentage of the donations intended for NSJP and remits the rest to it. By acting as a pass-through organization for NSJP, just as AJP does for AMP, WESPAC enables NSJP to operate without any financial transparency. The purpose of WESPAC's role is to shield the flow of funds to, from, and between NSJP, other anti-Israel/pro-Hamas organizations, and their financial sponsors.

41. As reflected in the 1993 wiretapped meeting between the Palestine Committee and Hamas, a key part of AMP and NSJP's strategy in influencing and interfering with American civil society on behalf of Hamas and Iran is concealing their direct aims: masking their primary mission of supporting terrorism, Islamist totalitarianism, and the genocidal destruction of Israel by claiming that their only goal is advocating for Palestinian self-determination and human rights against malicious Israeli military and political policies. These claims are a fig-leaf for AMP and NSJP's true purpose, as demonstrated by their statements and actions when they let the mask slip: 1) identifying their organizations as supporters of, and even part of, Hamas and its terrorist affiliates and allies; 2) coordinating with and disseminating instructions from Hamas and other FTOs; and 3) hosting speakers that are Specially Designated Global Terrorists or affiliated with

³⁵ Arno Rosenfeld, *The Secret History and Uncertain Future of Students for Justice in Palestine*, Forward (Dec. 20, 2023) <https://forward.com/news/574014/students-for-justice-in-palestine-history-operations-network-national-sjp/>.

them and collaborating with such organizations, particularly in training and directing AMP and NSJP's campus organizations. Hamas has directly recognized the importance of the pro-Hamas student movement in the United States led by AMP and NSJP for its operations and expressed gratitude and encouragement for their protests and disruptions that aid it in its war against Israel.³⁶

42. Despite their attempts to hide their true intentions and purpose, AMP and NSJP's message and the values they cultivate in NSJP's chapters and affiliates remains unambiguous: 1) violence against Zionism and "Zionists"—defined broadly to include all Jews and Israelis who do not side against Israel in Hamas's war of extermination against it—is justifiable and moral; 2) anyone who does not oppose Zionism is an enemy that can and must be targeted for harassment, intimidation, discrimination, and violence; 3) violating campus policies and the law is acceptable, necessary, and righteous under the banner of engaging in "resistance by any means necessary" against "Zionism and "U.S. imperialism."³⁷ The purpose of this messaging is twofold: morally laundering terrorism by Hamas and its affiliates within academia and in American society, and establishing a "permission structure"³⁸ in which violence against Jews, Israelis, and anyone else who refuses to stand with Hamas against Israel can be considered legitimate and laudable by American college students swept up into the protest movement created by AMP and NSJP.

43. By cultivating this mentality of hate and violence on campuses, AMP and NSJP continue the work of their predecessors in the Palestine Committee like HLF and IAP, providing continuous, systematic, and material support for Hamas and its affiliates. In serving as Hamas's

³⁶ *Hamas Leader Abroad Khaled Mashal: We Thank The Great 'Student Flood' At American Universities; We Want A 'Legal Flood' In The Hague; Annihilating The Zionists Is Good For Humanity; Being Far Away Doesn't Absolve Us From Jihad And Resistance*, MEMRI (May 21, 2024), <https://www.memri.org/reports/hamas-leader-abroad-khaled-mashal-we-thank-great-student-flood-american-universities-we-want>

³⁷ See, e.g., Small, *supra* note 32 at 11.

³⁸ *Permission Structure*, Model Thinkers (accessed Mar. 7, 2025), <https://modelthinkers.com/mental-model/permission-structure>.

and Iran's propaganda and activist arm in the United States, AMP and NSJP justify and normalize Hamas's terrorism and engage in acts of political activism, intimidation, disruption, and coercion to pressure American institutions like universities into taking actions beneficial to Hamas at the expense of the United States and its ally Israel.

II. AMP and NSJP collaborated with Hamas to have NSJP's campus organizations support Hamas in its war with Israel following the October 7th attack.

44. On October 7, 2023, Hamas, in collaboration with the IRGC and allied terrorist organizations, engaged in its largest ever terrorism operation against Israel. As part of its planning in advance of the attack, Hamas coordinated with AMP and NSJP to ensure they were maximally positioned to use NSJP's network of chapters and affiliates to support Hamas's terror activities and serve its interests through propaganda and activism influencing American civil society.

45. This preparation and planning involved multiple elements:

- AMP and NSJP centralizing and strengthening NSJP's control over the pro-Palestinian/anti-Israel activist movement on college campuses;
- AMP and NSJP preparing propaganda, training materials and strategic resources for NSJP's chapters and affiliates directing them to agitate in favor of the October 7th attack and Hamas and against Israel starting in the immediate aftermath of the attack—with an explicit focus on justifying violence against Jewish and Israeli civilians and glorifying their murder as noble and heroic;
- AMP and NSJP instructing and coordinating its NSJP's chapters and affiliates to engage in specific instances of mass demonstrations and disruptions on their campuses in support of Hamas in the wake of the October 7th attack—with NSJP dictating the marching orders for when these disruptions would happen, what they would look like, and the specific demands that chapters would make.

- AMP and NSJP collaborating with a network of other Hamas-supporting organizations to prepare propaganda, training, and strategic resources for the pro-Hamas activist movement both on and off campuses.

46. To enable AMP and NSJP to implement this campaign of support for Hamas following the October 7th attack, AMP and NSJP took steps to increase NSJP's control over its network of individual SJP chapters and affiliates, engaging in a multi-year program of centralizing and extending its control over the campus activist movement.

47. In 2022, AMP and NSJP arranged for tens of thousands of dollars in grants from the Sparkplug Foundation for the creation of a national network that would unify NSJP chapters under the control of NSJP's Steering Committee, as reflected in the Sparkplug Foundation's own summaries for the grants:

- NSJP will use Sparkplug funding to advance the creation of the first ever Students for Justice in Palestine National Network via supporting the 2022 NSJP Steering retreat. This retreat is vital to our organization's ability to plan, organize, and strategize the launch of the National Network project in the coming year.
- National Students for Justice in Palestine has prepared materials and refined internal structures to launch a new initiative: National Network. This will restructure the student movement to include a representative decision-making body, regional and national communication networks, and shared resources, unifying SJPs across North America for the first time.³⁹

48. AMP and NSJP continued their process of solidifying NSJP's control over its hundreds of campus chapters in early 2023. This change in structure was described in an interview by leaders of the NSJP chapter at George Washington University:

This is not widely known, but in the Spring of 2023, National SJP voted to create a centralized structure, which has allowed us to begin coordinating more not only

³⁹ *Past & Current Grants*, Sparkplug Foundation (last visited Mar. 31, 2025), https://www.sparkplugfoundation.org/past-grantees/?grant_period_id=&thematic_area=0&geographic_region=0&s=students+for+justice

across campus and our regional context but all over the county. That has allowed us to maintain a unified strategy, as opposed to disjointed actions.⁴⁰

By centralizing and expanding its control over campus chapters, NSJP positioned itself so that it could plan, organize, and order its over 300 campus chapters to engage in coordinated protests, disruptions, and violations of laws and campus rules in support of Hamas by shutting down and interfering with their schools' educational missions, propagandizing to and indoctrinating young Americans students while censoring and silencing anti-terror viewpoints, and bullying, harassing, intimidating, and assaulting Jewish students and faculty.

49. To make use of NSJP's now-strengthened command and control over its network of chapters and affiliates, AMP and NSJP collaborated with Hamas to prepare strategic plans and "toolkits" in advance of the October 7th attack for NSJP to rapidly disseminate to the campus groups under its control. These toolkits contained marching orders, propaganda and talking points, template flyers, and resources for disrupting campuses in support of Hamas's attack.

50. AMP and NSJP further collaborated with Hamas in advance of its planned terrorist attack on October 7, 2023, by preparing strategic plans and toolkits and coordinating with other pro-Hamas groups to implement a mass propaganda and activism campaign across the United States in support of Hamas and its terror attack ("Operation Al-Aqsa Flood") as soon as the attack occurred.

III. Hamas's October 7, 2023, terrorist attack on Israel.

51. On October 7, 2023, Hamas and a coalition of other terror groups, including the Popular Front for the Liberation of Palestine ("PFLP"), invaded Israel from Gaza to commit a

⁴⁰ *You Cannot Profit Off Our People's Blood and Think Students Will Not Come For Your Money*, HAMMER & HOPE (Spring 2024), <https://hammerandhope.org/article/palestine-college-students> (statement by SJP chapter at George Washington University).

wave of murders, tortures, rapes, and kidnappings. Hamas killed approximately 1,200 Israelis, including entire families along with their infants, and kidnapped a further 251 hostages, including 7 Americans.

52. The savagery and cruelty of Hamas's attack was documented by its terrorist perpetrators, who used cameras to film themselves raping women, burning families alive in their homes, shooting and stabbing the elderly, and killing and kidnapping children, including babies.

53. Among Hamas's most infamous acts was its attack on the Nova Music Festival, a music concert in southern Israel attended by hundreds of young people. Hamas terrorists using paragliders flew over the border between Gaza and Israel and landed near the festival, which they then assaulted, spraying machinegun fire into the young attendees. The Hamas terrorists raped and gangraped masses of women and men at the festival before summarily executing them. The barbarity of Hamas's massacre festival became a symbol of the barbarity of the October 7th attack more broadly, with the image of the Hamas terrorists on paragliders (captured in photographs) becoming an infamous representation of the October 7th attack and of the mass rapes and murder at the Nova Music Festival specifically:





54. The hundreds of hostages taken by Hamas and allied Palestinian civilians included the Bibas family, a family of four: Yarden Bibas, his wife Shiri, and their two young sons, 4-year-old Ariel and 9-month-old Kfir. Following the October 7th attack, a common way of expressing support for the hostages and victims of the October 7th attack, and condemning Hamas, was to post flyers with photos of the hostages calling for them to be released. Flyers of Ariel and Kfir Bibas were particularly prominent because of the self-evident cruelty of holding a 4-year-old toddler and a 9-month-old baby as hostages. On February 22, 2025, Hamas confirmed that it had killed Ariel and Kfir and their mother in captivity. Hamas terrorists strangled Ariel and Kfir to death and mutilated their bodies with rocks in a ploy to disguise their murder as the result of collateral damage from an Israeli airstrike.

55. Alongside the rapes, massacres, and kidnapping of civilians, Hamas fired over 2,200 missiles from Gaza into Israel, aimed at civilians. Over 6,900 people were injured in these attacks.

IV. AMP and NSJP enacted their plan with Hamas to use NSJP's campus organizations to agitate and disrupt American civil society in support of Hamas and the October 7th massacre.

A. Overview of AMP and NSJP's use of their campus chapters to support Hamas and groom them for violent, illegal operations.

56. Following through on their plans with Hamas, AMP and NSJP sprang into action to coordinate and direct NSJP's network of chapters and affiliates to rise up, disrupt, and agitate in support of the rapes, murders, and kidnappings Hamas and its allies perpetrated during the October 7th attack.

57. In the months of protest that followed, AMP and NSJP demonstrated their control and leadership over NSJP's campus chapters and affiliates at schools across the nation, frequently and repeatedly calling for campus organizations to engage in particular forms of disruptive protests on particular days, with hundreds of campus organizations following the instructions and complying.

58. AMP and NSJP not only directed these protests and actions to occur, they directly and indirectly supported them through toolkits providing propaganda materials, training, guidance, and strategy; conference calls and strategy sessions providing direct leadership to and coordination between and among chapters; encouragement and recognition of individual chapters' protest events and their glorification as a model for other chapters to follow; and mass activism campaigns, public relations efforts, and other resources defending individual chapters and activists against consequences when they violated school policy and/or the law in service of AMP and NSJP's calls to action in support of Hamas.

59. During these months of protest, AMP and NSJP groomed their campus chapters and affiliates to commit increasingly violent and illegal acts, praising and defending all of their

violent, unlawful, harassing, and antisemitic conduct, directing them to engage in an escalating series of disruptive protest actions, and providing them training, guidance, and resources to do so.

60. As sophisticated professional activists involved in a multi-decade project of advancing support for terrorism in the United States, AMP and NSJP's leadership understood the importance of attempting to maintain a surface-level appearance of not advocating for violence or criminal conduct. This surface-level avoidance of directly advocating violence is a tactical decision to provide AMP and NSJP plausible deniability and operational security; it reflects no actual commitment for their chapters and affiliates' to be nonviolent or avoid criminal activity.

61. AMP and NSJP are highly willing for their chapters and affiliates to engage in violent and unlawful activity when it furthers their goals. This is reflected in the conduct of their campus chapters and affiliates, which were frequently violent, discriminatory, and harassing to begin with, but grew more violent and hateful over the months as NSJP's protest campaigns continued, with direct attacks on Jews and Israelis and violent fights with police occurring on ever more campuses during or in connection with protests and disruptions by NSJP's chapters and affiliates.

62. Not only have AMP and NSJP not condemned any acts of violence or illegality committed by or in connection with any of NSJP's chapters and affiliates, they have consistently dedicated time, attention, and resources to defending blatantly violent and illegal conduct by the chapters and affiliates, engaging in public relations and activism campaigns on their behalf and attempting to sway public opinion and coerce school and law enforcement action to free them from consequences. To this end, AMP and NSJP have consistently fabricated knowingly false narratives about NSJP's chapters and affiliates' violent, unlawful conduct, consistently using a propaganda strategy of falsely claiming their chapters and affiliates are only ever engaged in acts of "free

expression” or “protected speech” and that any discipline or law enforcement action against them is “unconstitutional” or “violating their rights”—when in reality their chapters and affiliates are engaged in unprotected and unlawful acts of harassment, intimidation, violence, obstruction of law enforcement, trespass, and vandalism.

B. Immediately following the October 7th attack, AMP and NSJP sprang their chapters and affiliates into action on behalf of Hamas.

63. On October 8, 2023, as Israelis were still discovering bodies of the dead, attempting to identify burned remains, and accounting for who was missing, who was murdered, and who was kidnapped, and as Jewish and Israeli students on campuses across the United States were mourning their loved ones or waiting anxiously to hear if they were still alive, NSJP disseminated a “day of resistance toolkit” (the “Day of Resistance Toolkit”) to its campus chapters that AMP and NSJP had prepared with Hamas for immediate use following the attack. The Day of Resistance Toolkit is a combination press-release, set of orders, training guide, and propaganda resource for NSJP’s chapters and affiliates, inspiring, directing, training, and provisioning them to comply with NSJP’s call to engage in protests in support of the October 7th attack.⁴¹

64. The Toolkit’s introduction served as a Hamas press-release on the October 7th massacre, justifying and glorifying the murders and rapes to the students in NSJP’s campus organizations:

⁴¹ The full Day of Resistance Toolkit is attached as Exhibit C.

DAY OF RESISTANCE TOOLKIT

INTRODUCTION

National Students for Justice in Palestine is calling for a **national day of resistance** on college campuses across occupied Turtle Island and internationally this **Thursday, October 12th, 2023**

On the 50th anniversary of the 1973 war, the resistance in Gaza launched a surprise operation against the Zionist enemy which disrupted the very foundation of Zionist settler society. On the morning of October 8th, the Palestinian resistance stormed the illegitimate border fence, gaining control of the Gaza checkpoint at Erez, and re-entering 1948 Palestine. Referred to as Operation *Towfan Al-Aqsa* (Al-Aqsa Flood), the resistance has taken occupation soldiers hostage, fired thousands of rockets, taken over Israeli military vehicles, and gained control over illegal Israeli settlements. In the West Bank, the Palestinian resistance has called for collective action by the Palestinian masses amidst attempts by the Zionist entity to lock-up the West Bank. The Palestinian resistance has called for mass protests in every Palestinian city, and Palestinian workers have called for a general strike. In Gaza, Israel has launched an onslaught of airstrikes. As of Sunday, Oct 8th at 12pm ET, Israel has murdered 320 Palestinians and left over 2200 others injured. Despite this, our people choose resistance over negotiated cages on our homeland. Fearlessly, our people struggle for complete liberation and return.

Today, we witness a historic win for the Palestinian resistance: across land, air, and sea, our people have broken down the artificial barriers of the Zionist entity, taking with it the facade of an impenetrable settler colony and reminding each of us that total return and liberation to Palestine is near. As the Palestinian student movement, we have an unshakable responsibility to join the call for mass mobilization.

National liberation is near— glory to our resistance, to our martyrs, and to our steadfast people.

65. Throughout the Toolkit, NSJP used the euphemism “the resistance” and similar turns of phrase to refer to Hamas and its allied terror organizations perpetrating the attack: ex. “Referred to as Operation *Towfan Al-Aqsa* (Al-Aqsa Flood), the resistance has taken occupation soldiers hostage, fired thousands of rockets, taken over Israeli military vehicles, and gained control over illegal Israeli settlements. ... Today, we witness a historic win for the Palestinian resistance.” On information and belief, when AMP and NSJP, NSJP’s chapters and affiliates, and AMP and

NSJP's pro-Hamas collaborator organizations refer to "the resistance" generally, they are referring to Hamas and its network of allied terror organizations.

66. Following the introduction and announcement of its "National Day of Resistance" on campuses, the Toolkit stated that NSJP is "hosting a national call-in meeting to meet with chapters, talk through the political significance of this movement, talk through how-to's for the protest day of action and troubleshoot any support needed" and provided an RSVP link:

CALL TO ACTION: NATIONAL DAY OF RESISTANCE

- On Thursday, October 12th, National Students for Justice in Palestine is calling for a national day of resistance from the student movement for Palestine liberation on college campuses across occupied Turtle Island (so-called US and Canada) and beyond. We must continue to resist directly through dismantling Zionism, and wielding the political power that our organizations hold on our campuses and in our communities. We are asking chapters to host demonstrations on campus/in their

community in support of our resistance in Palestine and the national liberation struggle — one which they play a critical role in actualizing.

- Please fill out this brief form to let us know what events you will be hosting! These will be posted and publicized on our social media – filling out this form will help us better coordinate and unify nationally as a student movement
<https://forms.gle/H7uqKuVL22AAtzUZA>
- Please upload any pictures or videos that you are comfortable with us sharing here!
https://drive.google.com/drive/folders/1r4_5Ugt9eocMgvqm2J7FXlxRGTyovXBJ

We will also be having a "how to organize a protest," including roles, security, media training, and more, on the National Call-in meeting on Monday, Oct 9th at 8pm ET. The presentation + resources shared will be added to the tool-kit following the presentation. If you need additional help organizing or planning your protest, please reach out to [National Students for Justice in Palestine](#). (RSVP link above).

67. For campus organizations that were unable to protest as ordered, the Toolkit directly encouraged them to find other ways to disrupt their campuses, including by finding and collaborating with other nearby NSJP chapters.

68. The Toolkit's section on "Messaging & Framing" provided talking points explicitly directed at normalizing and justifying Hamas's mass murder and rape of civilians and kidnapping of children, claiming the October 7th attack was "the natural and justified response to decades of

oppression and dehumanization,” and that “[s]ettlers are not ‘civilians’ ... because they are military assets.” The Toolkit also made clear that NJSP considers itself “**part**” of Hamas [euphemistically referred to as the “resistance movement”], not only “in solidarity” with it:

MESSAGING & FRAMING

For over 75 years, our Palestinian people, through steadfast resistance, have waged a prolonged war for liberation and return to our colonized homeland. What we are witnessing now is a heightened stage of the Palestinian struggle—through tearing down colonial infrastructure and liberating our colonized land from illegal settlements and military checkpoints, our people are actualizing revolution. Palestine will be liberated from the river to the sea, and our resistance, through their bravery and love for land, continue to bring dignity and honor to the Palestinian people. As the diaspora-based student movement for Palestine liberation, our responsibility is to not only support, but struggle alongside our people back home. The forces of Zionism engage in media campaigns which attack our people and resistance from all sides— it is our responsibility, therefore, to break through their hegemonic narratives of “war” and “unprovoked aggression,” and instead ground our campuses and communities in a narrative which centers the legitimacy of resistance and the necessity of complete liberation. Please find below a breakdown of framework and important messaging which help contextualize, frame, and above all normalize and support our fearless resistance.

- **When people are occupied, resistance is justified — normalize the resistance.**
 - ◆ *The Palestinian people have the right to resist colonization and oppression.* The Palestinian people have the right to return to their homeland and free themselves from the complete land, air, and sea siege they’ve been subjected to; this requires resistance, and it is both morally just and politically necessary. These events are the natural and justified response to decades of oppression and dehumanization.
 - ◆ The fight for Palestinian liberation is a necessary struggle against an occupying and colonial state; not a “war” or “conflict.” It is a **struggle for national liberation**.
 - ◆ In the eyes of the West, there is no “right” way for Palestinians to fight for their freedom. Every tactic is met with repression.
 - ◆ The occupation, the day to day and the existence of Israel is not peaceful; there is no ‘maintaining the peace’ with a violent settler state.
 - ◆ Settlers are not “civilians” in the sense of international law, because they are military assets used to ensure continued control over stolen Palestinian land.
 - ◆ Responsibility for every single death falls solely on the Zionist entity. They do not care one bit for the Geneva Conventions but demand Palestinians follow them to the letter.
- **Gaza as the cradle of resistance**
 - ◆ *Gaza broke out of prison.* Resistance fighters captured one of the bulldozers used to destroy Palestinian homes, and used it to breach the illegitimate border fence back into ‘48 Palestine.
 - ◆ Gaza is being subject to collective punishment because the occupation knows liberation is inevitable.

- ◆ Zionists are telling Gazans to leave while also denying them freedom of movement—this is a call for genocide of Palestinians.
 - "I say to the residents of Gaza: Leave now because we will operate forcefully everywhere."--Netanyahu
- ◆ This is not "unprovoked". Apartheid, ethnic cleansing, indiscriminate bombing, arbitrary detention, destruction of infrastructure, 75 years of settler colonialism are provocations.
- **Liberation is material**
 - ◆ *Liberation is not an abstract concept.* It is not a moment circumscribed to a revolutionary past as it is often characterized. Rather, liberating colonized land is a real process that requires confrontation by any means necessary. In essence, decolonization is a call to action, a commitment to the restoration of Indigenous sovereignty. It calls upon us to engage in meaningful actions that go beyond symbolism and rhetoric. Resistance comes in all forms— armed struggle, general strikes, and popular demonstrations. All of it is legitimate, and all of it is necessary.
 - ◆ "You don't get freedom peacefully. Freedom is never safeguarded peacefully. Anyone who is depriving you of freedom isn't deserving of a peaceful approach by the ones who are deprived of their freedom."-Malcolm X
- **Israel is fragile**
 - ◆ This action of resistance shatters the illusion of Israel as an impenetrable, indestructible entity. The Zionist entity is fragile, and Palestinian resistance is alive. The IOF are still in disarray and the resistance fighters are still launching new attacks into 48.
 - ◆ The Zionist entity built a massive technological barrier to imprison Gaza that the resistance neutralized in hours. They massively underestimated the ingenuity of the resistance, and will continue to do so.
 - ◆ Settlers are already fleeing the land, their 'dedication' to the settler colony is easily broken. The dedication of Palestinians for their national liberation is unshakable.
 - ◆ *From Rhodesia to South Africa to Algeria, no settler colony can hold out forever.*
- **Unity Intifada**
 - ◆ The revolution is being waged across historic Palestine— not just cross-factional, but unifying our people in the name of resistance
 - ◆ All Palestinian factions in Gaza appear to be participating under unified command.
 - ◆ *This is the first time since 1949 that a large-scale battle has been fought within 48 Palestine.*
- **We as Palestinian students in exile are PART of this movement, not in solidarity with this movement.**
 - ◆ *This is a moment of mobilization for all Palestinians. We must act as part of this movement. All of our efforts continue the work and resistance of Palestinians on the ground.*

HASHTAGS

- #studentdayofresistance
- #operationalaqsaftlood
- #nationalliberationisnear
- #davofresistance

69. The final section of the Day of Resistance Toolkit contained graphic templates celebrating the October 7th massacre for campus groups to use in announcing their plans for "National Day of Resistance" protests in accord with NSJP's orders, including celebratory

sketches of the Hamas terrorists who used paragliders to assault the Nova Music Festival and massacre and rape its young attendees:

TEMPLATE GRAPHICS

[CANVA GRAPHIC TEMPLATE LINK FOR PROTESTS](#) [LINK WITH BELOW GRAPHICS]

TABLING MATERIALS AND OTHER GRAPHICS COMING SOON



70. The Toolkit directed NSJP’s chapters and affiliates to sign onto the “Towfan Al-Aqsa Statement” created by NSJP’s chapter at the University of California Berkeley. The signing NSJP chapters and affiliates declared their “unwavering support of the resistance [Hamas] in Gaza and the broader occupied lands,” and that they “support the resistance, [they] support the liberation movement, and [they] indisputably support the Uprising [the October 7th attack]:”

Bears for Palestine Solidarity Statement: Resistance Uprising in Gaza

*"Palestine is the canvas upon which people paint their resistance" -Ghassan
Khanafani*

Dear community members, allies, and fellow Palestinians:

Bears for Palestine, as a chapter of the united coalition of Students For Justice in Palestine, unequivocally denounces the occupation and its military rule. We display our unwavering support of the resistance in Gaza and the broader occupied Palestinian lands.

We recognize the apartheid regime upheld within the colonial occupation of Palestinian indigenous land as a continuous ethnic cleansing. Military violence inflicted upon Palestinians is an ongoing and daily element essential for upholding the state of Israel.

We call to attention that the Israeli occupation has created a multi-generational diaspora that is inextricably linked to the insurmountable destruction of the Palestinian way of life. Hence, Israel, as a settler colonial state, renders Palestinian existence inherently an act of resistance. We invariably reject Israel's framing as a victim. Whereas to demonize and condemn indigenous resistance is to overshadow the decades of oppression, ethnic cleansing, and destruction of the Palestinian people.

In light of Towfan Al-Aqsa [translates to Al-Aqsa flood], we recognize the Second Intifada as one of the last major historic markers of the resistance. **The occupational borders of 1967 haven't been broken like this since the Second Intifada.** Towfan Al-Aqsa now stands as a revolutionary moment in contemporary Palestinian resistance. We honor Palestinians who "are working on the ground on several axes of the so-called 'Gaza envelope' alongside our comrades in blood and arms, and what is coming is greater. Victory or martyrdom."

Our support extends to those living under occupation and siege, Palestinian citizens of Israel, and the 7 million Palestinian refugees exiled in Jordan, Lebanon, Syria and Palestine. A refugee's right to return to their homeland is the most important aspect of justice for Palestinians everywhere. We as students possess an obligation to support the liberation movement and embody a solidarity that transcends theory and is grounded in practice. Whereas "the truth is that we are not yet free; we have merely achieved the freedom to be free, the right not to be oppressed." - Steve Biko

The occupation and colonization is ongoing, and thus our people's freedom will not be attainable without revolution. We will continue to advocate for a free and liberated Palestine.

We support the resistance, we support the liberation movement, and we indisputably support the Uprising.

Gaza is the cradle of our resistance and the lifeblood of our struggle. We echo the call to action for all Arabs and Palestinians in the diaspora to rise up to support the liberation of our occupied peoples. From the River to the Sea, we will continue to support resistance until we are able to return home to a unified Palestine. Glory to Palestine, glory to the resistance, and glory to our martyrs.

Until Return and Liberation,

Bears for Palestine at UC Berkeley

NOTE: As of post October 7th, 2023 at 3pm PST, if you/your organization wishes to sign on, please use [this link](#) to record your organization's name as wished to appear in the signature list, and we will manually add it to this growing list. Thank you for your support and solidarity

Signed in unison and unwavering solidarity,

71. Eighty-three of NSJP’s chapters and affiliates signed the statement as of its dissemination in the Toolkit. A note at the bottom of the statement indicates that they signed the statement “in unison” *before* October 7, 2023, at 3 PM PST—i.e., the statement declaring these NSJP’s chapters and affiliates’ support for Operation Al-Aqsa Flood and Hamas was drafted and circulated among eighty-three of NSJP’s chapters and affiliates for a joint signature in anticipation of the October 7th attack.

72. On information and belief, AMP and NSJP had prior knowledge of the October 7th attack, based on the apparent advance preparation of the materials in the Day of Resistance Toolkit referring to the details of the October 7th attack, including graphic designs incorporating Hamas terrorists in paragliders and the incorporation of the Towfan Al-Aqsa Statement—which itself appears to have been circulated among eighty-three of NSJP’s chapters and affiliates prior to the attack. Additionally, NSJP’s Columbia chapter had apparent foreknowledge of the attack, posting to its Instagram account, “We are back!!!” and announcing its first meeting of the semester and that its social media audience should “Stay tuned” shortly *before* Hamas began its attack.⁴² Prior to this post, the chapter’s Instagram account had not posted significant content for months.

73. Alongside its Day of Resistance Toolkit, AMP and NSJP collaborated with a coalition of other pro-Hamas organizations—including Palestinian Youth Movement, Dissenters, and National Muslims Students Association—to plan their activities in support of Hamas’s attack plans. This coordination resulted in a “Student Week of Action Toolkit” (the “Student Toolkit”)⁴³ and “Fall 2023, Palestine Organizing Toolkit” (the “Solidarity Toolkit”).⁴⁴

⁴² This allegation relates to the claims in Complaint, *Haggai v. Kiswani*, No. 1:25-cv-2400, ¶ 92 (S.D.N.Y. Mar. 24, 2025).

⁴³ The full Student Toolkit is attached as Exhibit D.

⁴⁴ The full Solidarity Toolkit is attached as Exhibit E.

74. The Student Toolkit called for a “National Week of Action for Palestine” between October 18–25, 2023:

NATIONAL WEEK OF ACTION FOR PALESTINE

October 18th - 25th



Join students across Turtle Island for a week of action in solidarity with millions of Palestinians on the ground facing bombardment, genocide, and apartheid and to demand an end to the US-backed siege on Gaza.

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75. The Student Toolkit’s overview provided campus activists their mission briefing and justification for engaging in disruptive direct actions at their schools, parroting Hamas’s false propaganda narratives about Israel engaging in resource-deprivation and starvation tactics against

Gazan civilians in order to agitate students into interfering with their schools' operations in service of Hamas's objectives.⁴⁵

76. The Student Toolkit ordered student activists to make demands on their universities that directly served Hamas's interests of exerting diplomatic pressure on Israel not to retaliate against Hamas and cutting off American military and economic relations with Israel:

OUR DEMANDS

1. We demand an **immediate end** to Israel's siege on Gaza and the U.S. military funding to Israel.
2. We demand **our universities fully divest** from weapons' corporations which arm Israel's genocide in Gaza.

77. To coerce schools into complying with these demands, the Student Toolkit instructed campus activists to "gather your collaborators to plan an action on campus" and provided a list of example "actions" in an appendix at the end of the document.⁴⁶

78. The list of example "actions" in the appendix included disruptions targeted at interfering with schools' educational functions, trespassing in and taking over school buildings, illegally and dangerously blockading buildings to impede entrance and exit, and gang-stalking targeted individuals.⁴⁷

79. The Student Toolkit's appendix linked to descriptions and manuals on these disruption tactics by the group Beautiful Trouble, a self-styled band of revolutionaries who produce guides on "strategic troublemaking" and criminal disruptive acts for radical leftwing political movements.⁴⁸

⁴⁵ Exhibit D at 2.

⁴⁶ *Id.* at 9-13.

⁴⁷ *Id.*

⁴⁸ *A Toolbox for the Revolution*, Beautiful Trouble, <https://beautifultrouble.org/toolbox-guide>.

80. The Student Toolkit directed campus activists to share its contents widely and use its resources and instructions to plan direct actions. Included within the Student Toolkit were instructions on assigning and organizing specific “roles” for activists in the disruptive actions that it contemplated, including multiple roles dedicated to interacting with the police in contemplation of their response to illegal conduct by the activists as part of their “actions.”⁴⁹

81. NSJP’s direct support for and involvement with these disruptive actions is demonstrated in the “Resources” section of the Student Toolkit, which stated that NSJP’s “Campus Support Coalition” would provide campus activists “additional resources, action planning, or campus backlash support.”⁵⁰

82. In addition to AMP and NSJP’s work on the Student Toolkit with this coalition of other pro-Hamas groups, they collaborated with an overlapping coalition of similar groups as part of a “Palestine Solidarity Working Group” on a “Fall 2023, Palestine Organizing Toolkit.” This coalition included Palestinian Youth Movement, U.S. Campaign for Palestinian Rights, Palestinian Feminist Collective, and American Friends Service Committee. The Solidarity Toolkit was created to direct, advise, train, and provide resources for pro-Hamas agitators on campuses and elsewhere to enforce demands on behalf of Hamas.

83. The Solidarity Toolkit linked to a suite of “Key Resources,” including NSJP’s Student Toolkit and Day of Resistance Toolkit.⁵¹

84. The Toolkit explicitly promoted engaging in “direct action” as one of its primary “Organizing Ideas.”⁵² “Direct action” is a term used in communist and left-aligned radical political

⁴⁹ *Id.* at 6-7.

⁵⁰ *Id.* at 8.

⁵¹ Exhibit E at 2.

⁵² *Id.*

movements to refer to disruptive and illegal acts intended to coerce compliance with the movements' demands. "Direct actions" include property destruction, vandalism, trespassing and illegally taking over buildings and properties, violent street organizing and thuggery, and acts of mass intimidation and harassment. Aware that explicitly organizing violent activities is a crime and exposes them to liability, radical political movements that organize and provide resources and training for "direct actions" often claim they intend only to organize "nonviolent direct action." But this caveat is belied by these movements considering property destruction and other criminal activities to be "nonviolent" so long as they do not involve causing direct injury to individual people, and by the violence, street fights, property destruction, and intimidation that accompanies these movements' "nonviolent direct actions" without condemnation or meaningful disavowal by the organizers.

85. The Solidarity Toolkit directly contemplated that the "direct actions" it was encouraging would be criminal, linking under its "For Direct Actions" section a "step-by-step guide to organizing a direct action produced" by the group "CrimethInc" that was written for activists intending to commit crimes.⁵³ The linked guide instructs "guerillas" on how to organize their "cells," prepare and execute crimes such as property destruction, evade law enforcement, and destroy evidence of their criminal enterprises.⁵⁴ The Solidarity Toolkit instructed activists to "follow the lead of any Palestinian grassroots or Palestine solidarity groups (i.e. PYM, SJP, AMP, USPCN, etc.) in your community" and to "reach out about how you can support them" if "they are already organizing [direct] actions."⁵⁵ The Solidarity Toolkit provided a link to a list of companies

⁵³ *Id.*

⁵⁴ *A Step-by-Step Guide to Direct Action*, CrimethInc (Mar. 14, 2017), <https://crimethinc.com/2017/03/14/direct-action-guide>.

⁵⁵ Exhibit E at 2.

to target with criminal action and instructed activists to follow the example of “comrades” in the English group Palestine Action, who had committed a series of crimes targeting the property and operations of Israeli company Elbit Systems.⁵⁶

86. The final section of the Solidarity Toolkit was a “Messaging Guidance” produced by NSJP, taken from its Day of Resistance Toolkit.⁵⁷

87. AMP and NSJP accomplished their objective in developing and disseminating the Day of Resistance Toolkit, Student Toolkit, and Solidarity Toolkit: hundreds of SJP chapters and affiliates on hundreds of campuses commenced protest campaigns in accord with NSJP’s orders and toolkit materials, including “Day of Resistance” protests on October 12, 2023, and “Student Week of Resistance” protests during October 18-25, 2023.

V. AMP and NSJP launched the first phase of their campus operations leading an international campus movement to support Hamas and the October 7th attack.

A. Immediately following the October 7th attack, AMP and NSJP directly organized and led NSJP’s chapters and affiliates protests.

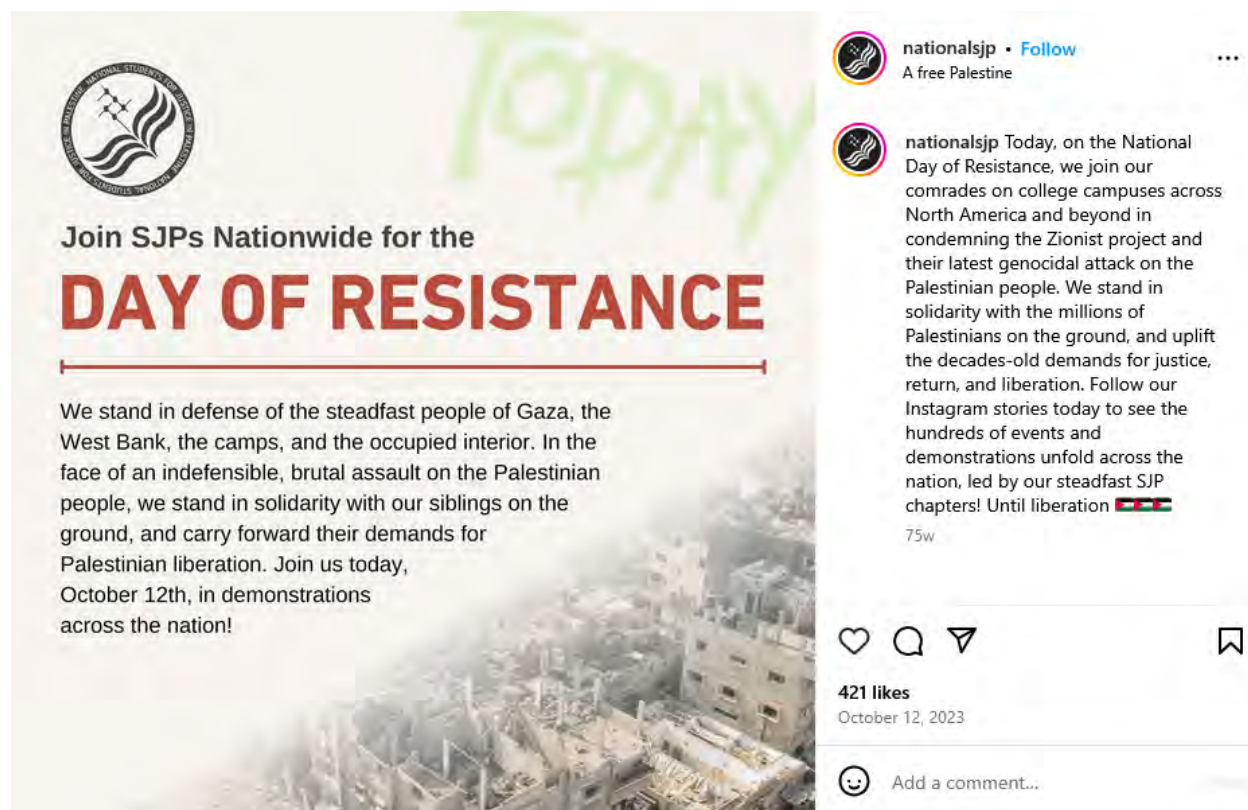
88. The purpose of the first phase of AMP and NSJP’s campus operations immediately following the October 7th attack was to activate, coordinate, and galvanize NSJP’s network of chapters and affiliates, cultivating their willingness to protest and disrupt their campuses in obedience to NSJP’s calls to action, and developing and expanding AMP and NSJP’s reach to new campuses.

89. On October 12, 2023, NSJP declared a “Day of Resistance.” NSJP proudly posting to its Instagram account—its primary and most public-facing tool for directing and coordinating its chapters and affiliates—a call to action to join its planned protests and disruptions, boasting

⁵⁶ *Id.*

⁵⁷ *Id.* 4-5.

that there were “hundreds of events and demonstrations unfold[ing] across the nation, led by our steadfast SJP chapters!”⁵⁸



90. In addition to its internal distribution channels, NSJP shared its Student Toolkit online in promotional posts for its “Student Week of Action”⁵⁹ and scheduled a “National Student Walkout” for October 25, 2023.⁶⁰ On October 24, 2023, NSJP boasted on Instagram that as a result of its commands and coordination, “30,000 students from over 100 campuses across North America will be walking out of classes and disrupting business as usual tomorrow for Gaza” in service of its list of demands—demands that served Hamas’s military and political goals of

⁵⁸ National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/p/CyTfGVFLDYI/> (Oct. 12, 2023).

⁵⁹ National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/p/CyhktqiMHKN/?hl=en&img_index=1 (Oct. 17, 2023).

⁶⁰ Dissenters (@wearedissenters), Instagram, <https://www.instagram.com/p/CyosM-QPghj/?hl=en> (Oct. 20, 2023).

stopping Israel's military response to the October 7th attack, breaking apart the United States' alliance with Israel, and having universities divest from companies engaged in military equipment transactions with Israel.⁶¹

91. NSJP joined with a coalition of other pro-Hamas groups to organize and direct a national march on Washinton, D.C. to agitate in favor of Hamas's military and strategic goals. NSJP advertised for the event and called on its chapters and supporters to attend.⁶² Reflecting NSJP's command and control over its activists and their responsiveness to its order, NSJP shared a triumphant post that its events and organizing had resulted in over 300,000 protestors marching in D.C in the "largest pro-Palestine action in US history."⁶³

92. Following NSJP's call for a "Student Week of Action," NSJP then ordered all its students and chapters to participate in a "Shut It Down! For Palestine" protest action on November 9, 2023, for the purpose of enforcing pro-Hamas demands on U.S. institutions by holding disruptions and protest actions on campuses and at public institutions.⁶⁴

93. NSJP and its pro-Hamas coalition partners, Palestinian Youth Movement, We Are Dissenters, Answer Coalition, and The People's Forum, made the "Shut It Down! For Palestine" event into an ongoing protest campaign, organizing hundreds of protest actions weekly for months on end, with active and ongoing participation from many of NSJP's chapters, particularly in New York City, operating on NSJP's orders.

⁶¹ Dissenters (@wearedissenters), Instagram, https://www.instagram.com/p/CyZg7OSrKtD/?hl=en&img_index=1 (Oct. 24, 2023).

⁶² National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/p/CyqwH2iLRmW/?hl=en> (Oct. 21, 2023).

⁶³ The People's Forum (peoplesforumnyc), Instagram, https://www.instagram.com/p/CzRnaL9gYCb/?hl=en&img_index=1 (

⁶⁴ National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/p/CzKGAE3pezX/?hl=en&img_index=1 (Nov. 2, 2023).

94. In support of NSJP's organizing and to extend its operational capabilities for disruption and agitation in service of Hamas to more campuses, NSJP actively solicited the creation of more campus chapters, publicly advertising offers to train, support, and direct the creation of new SJP chapters:⁶⁵



95. On November 13, 2023, NSJP called for its chapters to engage in an “International Day of Student Struggle” on November 17, 2023, for which NSJP stated it would be hosting a “campus strategizing session” and stated that it would be privately distributing resources to its chapters and affiliates “soon.”⁶⁶ As the post indicates, AMP and NSJP organized, led, coordinated, and trained NSJP's chapters and affiliates in engaging in disruptive protests under their orders privately and directly:

⁶⁵ National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/p/CzcbFIHMBGq/?hl=en> (Nov. 9, 2023).

⁶⁶ National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/nationalsjp/p/CznH6uDNqhl/?img_index=1 (Nov. 13, 2023).



96. On November 14, 2023, NSJP posted links and advertisements for a series of toolkits, training materials, and resources for its “International Day of Student Struggle.”⁶⁷ The

⁶⁷ National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/nationalsjp/p/Czpg1Q_sKPX/?img_index=1 (Nov. 14, 2023).

linked toolkits resembled NSJP's other toolkits, providing strategies on organizing and executing disruptive direct actions and mobilizing in service of Hamas's interests. The toolkits hosted at the site NSJP linked to were for a variety of purposes, including a student toolkit produced by NSJP, a labor organization toolkit, a media toolkit, a healthcare workers toolkit, a store closure toolkit, and a toolkit for direct actions interfering with businesses dealing with Israel.⁶⁸ The post encouraged campus organizations and activist groups to "Register Your Action" with NSJP and its coalition of pro-Hamas groups to enable them to coordinate and support the protest actions and disruptions. As the post indicates, AMP and NSJP held command and control over NSJP's chapters, having them register their actions with NSJP so that it could centrally administrate over them.

97. NSJP celebrated and encouraged its campus chapters' for carrying out its orders for an "International Day of Student Struggle," congratulating its chapters on direct actions ranging "from die-ins to banner drops, to sit-ins and more" and stating, "we are escalating our tactics and pushing our demands on campus in spite of unprecedented levels of repression and backlash from our universities and the Zionist lobby."⁶⁹ NSJP shared examples of disruptive protest actions taken by chapters across the country, including building takeovers and vandalism.⁷⁰ NSJP then shared a series of posts signal-boosting and celebrating individual chapters that engaged in large and disruptive protests, including its chapters and affiliates at CUNY.⁷¹

⁶⁸ *Toolkits*, Shut It Down 4 Palestine (last visited Apr. 8, 2025), <https://www.shutitdown4palestine.org/toolkits>.

⁶⁹ National Students for Justice in Palestine (@NSJP), Instagram, https://www.instagram.com/p/CzziZ3IOi0w/?hl=en&img_index=1 (Nov. 18, 2023).

⁷⁰ *Id.*

⁷¹ The Philly Palestine Coalition (@phillypalestinecoalition), Instagram, https://www.instagram.com/p/Czyk4d_OSni/?hl=en&img_index=1 (Nov. 18, 2023) (Philadelphia Students for Justice in Palestine Alliance); American Muslims for Palestine: Connecticut Chapter (@ampalestinect), Instagram, https://www.instagram.com/p/Cz1ZzShg_Zy/?hl=en (Nov. 19, 2023) (American Muslims for Palestine, Connecticut);

98. Reflecting NSJP’s close coordination and involvement with its chapters and affiliates at CUNY in particular and its direct support for and engagement with their protest activities, on November 21, 2023, NSJP publicized a pledge developed by its primary chapter at CUNY, CUNY for Palestine.⁷² The pledge affirmed that the signing NSJP chapters and affiliates were committed to engaging in disruptive protests and defending one another’s ability to do so from legal or disciplinary consequences, and forcing the United States government to withdraw support from Israel in its war with Hamas. At the time that NSJP and CUNY for Palestine published the pledge, 28 other NSJP chapters and affiliates had endorsed it, including four other NSJP chapters at the CUNY system: SJP at Lehman College; SJP at John Jay College; Brooklyn College SJP; Palestine Solidarity Alliance of Hunter College. The development and dissemination of this pledge reflects the close and direct working relationship AMP and NSJP have with CUNY for Palestine in organizing disruptive activism in service of AMP and NSJP’s pro-Hamas mission.

99. On November 24-25, 2023, AMP hosted its “Campus Activism Track” program (“CAT”), an intensive training bootcamp for its campus organizations “designed to help student organizers navigate activism on their college campuses” and “provide [students] with the tools and resources [they] need to strengthen pro-Palestinian presence on [their] campus.”⁷³ “The CAT program is designed and led by former SJPers and student activists” so that students can “[l]earn from some of the most experienced organizers to advance [their] own path as a student activist.”

Students for Justice in Palestine at ODU (@sjpatodu), Instagram, https://www.instagram.com/p/Cz3mzwmlfC/?hl=en&img_index=1 (Nov. 20, 2023) (SJP at Old Dominion University); Dissenters (@wearedissenters), Instagram, <https://www.instagram.com/p/Cz4JdGiro1O/?hl=en> (Nov. 20, 2023) (SJP chapters and affiliates at CUNY; Brooklyn College; Greater Chicago Area; Yale; University of Montana; Greater San Francisco Area; University of California Berkeley; University of Connecticut).

⁷² CUNY for Palestine (@cuny4palestine), Instagram, https://www.instagram.com/p/Cz6uwajODCA/?hl=en&img_index=9 (Nov. 21, 2023).

⁷³ Campus Activism Track (@cat_amp), Instagram, https://www.instagram.com/cat_amp/p/Cz45EZULPma/?hl=en&img_index=1 (Nov. 20, 2023).

AMP and NSJP advertised for the CAT program and tied its training to the ongoing disruptions they were organizing on campuses through SJP chapters and affiliates.

100. On November 29, 2023, NSJP republicized on its Instagram account a short documentary by BreakThrough News describing the logistical sophistication of the “Shut It Down! For Palestine” campaign that NSJP was orchestrating with other groups, including how it required “hundreds and hundreds” of organizers to assist with planning “500 actions every single week all at once” across the country.⁷⁴ The organizer interviewed for the documentary referred to the organizers in NSJP and its coalition partners as having a special role in “mobilizing” in the fight against Zionism and U.S. imperialism because they “are in the belly of the beast.” This rhetoric of “mobilizing from within the belly of the best” of “U.S. imperialism” is the same rhetoric used by senior terrorists within PFLP when indoctrinating American college students during training sessions set up by NSJP chapters in advance of violent campus protests.⁷⁵

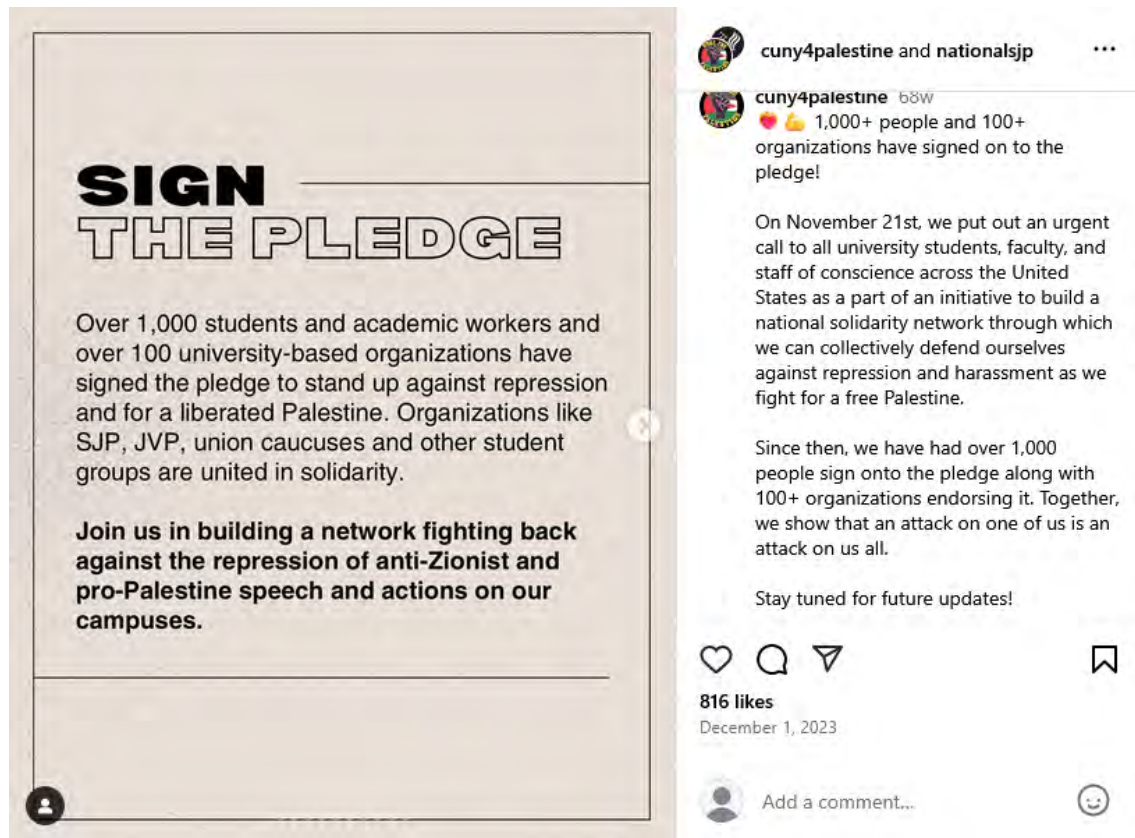
101. On December 1, 2023, NSJP again demonstrated its direct and close involvement with CUNY for Palestine, collaborating with CUNY for Palestine to produce and disseminate another national pledge for NSJP’s chapters and affiliates.⁷⁶ CUNY for Palestine boasted that “over 1,000 students and academic workers and over 100 university-based organizations have signed the pledge” to join in “building a network fighting back against the repression of anti-Zionist and pro-Palestine speech and actions on our campuses.” The pledge again affirmed that NSJP, its campus chapters and affiliates, and allied organizations would collaborate in defense of

⁷⁴ BreakThrough News (@btnewsroom), Instagram, <https://www.instagram.com/p/C0PSCERgyt1/?hl=en> (Nov. 29, 2023).

⁷⁵ Isabel Vincent and Dana Kennedy, *Pro-terror radical launched 2-hour anti-Israel tirade at Columbia University event weeks before protests exploded: ‘Nothing wrong with being a Hamas fighter’*, New York Post (Apr. 24, 2024), <https://nypost.com/2024/04/24/us-news/palestinian-radical-at-columbia-nothing-wrong-with-hamas/>

⁷⁶ CUNY for Palestine (@cuny4palestine), Instagram, https://www.instagram.com/p/C0UsHo4OatX/?hl=en&img_index=1 (Dec. 1, 2023).

their ability to protest and disrupt campuses in service of NSJP's pro-Hamas demands, stating, "An attack on one of us is an attack on all of us. If one of us is attacked, we all rise up. ¡Bast ya!"



SJPs are being banned - not just in red states like Florida but in D.C.'s George Washington University and NYC's Columbia University. Columbia has gone a step further by also banning JVP. In New York State, Governor Kathy Hochul recently allocated \$75 million dollars towards the policing and surveillance of Palestine solidarity organizers, and has established a special commission to investigate 'anti-semitism' at CUNY.

This is the new McCarthyism. We must unite to fight back. We must fortify our movements and networks so that we can continue to organize and build towards a collective liberation.

An attack on one is an attack on all.

We pledge:

1. To defend the rights of pro-Palestinian campus groups which are under attack;
2. To defend the right to political speech on our campuses, including speech in defense of Palestinian liberation, as well as the right to protest and engage in acts of civil disobedience;
3. To defend each other from harassment, intimidation, suspensions, firings, and other forms of repression;
4. To speak out against Israel's genocidal campaign against Palestinians and its broader settler colonial project, and to force the U.S. government to stop funding and defending this genocidal project.

102. Alongside working with CUNY for Palestine to create a national network of mutual defense for NSJP’s chapters and affiliates to “rise up” when “one of us is attacked,” NSJP published a threatening message targeted at “the Biden Administration, the US Congress, mainstream media, and university administrations” promising to “hit them where it hurts” and “come[] for their money.”⁷⁷

103. On December 2, 2023, NSJP advertised a training event for “creat[ing] resilient organizing infrastructure” to “proactively protect your organizations and create long-lasting relationships through joint struggle with other campus groups.”⁷⁸ The training would be led by Columbia University Apartheid Divest (“CUAD”) and three other NSJP chapters. CUAD is one of, if not the most, infamous NSJP chapter in the United States. It is directly responsible for antisemitic violence, classroom disruptions, property destruction, and mob takeovers of buildings and riots on Columbia’s campus. CUAD has directly affiliated itself with Hamas and publicly declared its support for Hamas’s terrorism. This training event reflects that NSJP works with CUAD as a model chapter that NSJP holds up as an example for its other chapters and affiliates to follow, and that NSJP works directly with CUAD to develop and advance its operations on campuses across the nation.

⁷⁷ National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/p/C0UvVruOHQj/?hl=en&img_index=2 (Dec. 1, 2023).

⁷⁸ National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/p/C0W_iRpPDdp/?hl=en (Dec. 2, 2023).



104. On December 4, 2023, NSJP hosted a second training session on how to start a new NSJP chapter on campus, promising to “provide resources and guidance for laying the foundation for starting an SJP on your campuses” in order to “pressure our institutions until we see a free Palestine.”⁷⁹

105. On December 7, 2023, CUNY for Palestine and NSJP collaborated to host a webinar training event for the launch of its “Palestine Solidarity Network against Repression” to “connect with faculty, staff, and students facing backlash at their universities for their solidarity with Palestine” for “a discussion on campus repression, how to fight back, and ways to build together.”⁸⁰ The event proudly featured a representative from the so-called “Tampa 5,” a group of

⁷⁹ National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/p/C0SUic1ufhb/> (Nov. 30, 2023).

⁸⁰ CUNY for Palestine (@cuny4palestine), Instagram, <https://www.instagram.com/p/C0ji0xVsnn4/?hl=en> (Dec. 7, 2023).

college students who were arrested and prosecuted after fist-fighting with police during a protest in March 2023.⁸¹ This event further reflects NSJP's close involvement with CUNY for Palestine's operations, their direct collaboration, and CUNY for Palestine's role in assisting NSJP with leading its efforts to network and coordinate NSJP's chapters in mutual defense.

106. NSJP ordered its chapters and affiliates to engage in a "Global Strike," demanding its chapters and affiliates "organize, mobilize and strategize in response to this global action!"⁸² "There will be no business as usual. We will not stop until the Palestinian people are free from the clutches of settler colonial violence and oppression."

107. On December 14, 2023, NSJP published a guide with "5 helpful tips to get started" in "building a coalition on campus" to advance its mission. Reflecting NSJP's direct and close engagement with CUAD and its role as a model chapter assisting NSJP with developing and initiating protest nationwide protest operations, NSJP collaborated with CUAD in creating the guide, alongside other NSJP chapters at the University of California, George Washington University, and Harvard.⁸³ The guide encouraged campus activists and organizations to contact NSJP's "campus support coalition" "if [they] need help getting started," indicating that AMP and NSJP were directly involved in setting up and giving marching orders to new NSJP chapters and affiliates.

⁸¹ Nancy Guan, *The 'Tampa 5' protesters are no longer facing felony charges*, WUSF (Dec. 5, 2023), <https://www.wusf.org/university-beat/2023-12-05/tampa-5-protestors-no-longer-facing-criminal-charges>; Gabriella Pinos, *A 'Tampa 5' protester and member of a USF student group speaks at a national march for Palestine*, WUSF (Nov. 4, 2023), <https://www.wusf.org/university-beat/2023-11-04/tampa-5-protester-member-usf-student-group-speaks-national-march-palestine>.

⁸² National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/nationalsjp/p/C0sKjv1O0o-/> (Dec. 10, 2023).

⁸³ National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/p/C02Y9IISY3R/> (Dec. 14, 2023).

108. On December 15, 2023, NSJP advertised its “Winter Break Toolkit” for students to use to “continue engaging [their] communities ... through utilizing various forms of propaganda.” NSJP directed its activists to “take pictures of your actions and visual disruptions and share it with us” by “tagging @nationalsjp.”⁸⁴

109. On December 20, 2023, NSJP hosted an “End of Semester Wrap-Up Meeting” to “regroup, reflect, and chart the course ahead” and “debrief our efforts, strategize next steps, and develop a national agenda for the upcoming term.”⁸⁵

110. As demonstrated by the many “strategy sessions,” training seminars, scheduled call-ins, and indications that AMP and NSJP were directly disseminating resources and orders to their chapters and affiliates through private communications channels, AMP and NSJP’s role in organizing, training, leading, and directing NSJP’s chapters and affiliates in their protest activities went far beyond general statements of support or encouragement. And as demonstrated by AMP and NSJP’s use of social media to issue specific orders to NSJP’s chapters and affiliates regarding which events to plan and what demands to make on their schools and to disseminate training toolkits that contained explicit instructions and strategies for disrupting their campuses, AMP and NSJP’s social media use was not limited to general advocacy and encouragement of their pro-Hamas positions.

⁸⁴ National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/p/C046nJfOvIV/> (Dec. 15, 2023).

⁸⁵ National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/nationalsjp/p/C07fXMMOBpC/> (Dec. 16, 2023).

B. AMP and NSJP's role in directly organizing and assisting protests and organization efforts by NSJP's chapters and affiliates continued into the beginning of 2024.

111. In the first months of 2024, leading up to AMP and NSJP's encampment operation, AMP and NSJP further involved themselves in directly supporting, promoting, and publicizing NSJP's chapters and affiliates' protests and disruptions.

112. On January 8, 2024, NSJP joined in a post by its chapter at the Ohio State University, celebrating the 35 "actions" it had taken during the Fall 2023 semester.⁸⁶ The post showed that the chapter had consistently responded to NSJP's orders to protest at appointed dates and times and in appointed ways, including a "Day of Resistance Protest" on October 12th, participating in the "National Walkout" on October 25th, and the "Shut It Down! For Palestine" protest on November 9th, the "Day of Action" on November 17th.

113. On January 10, 2024, NSJP joined in organizing a protest by its chapter at the University of Illinois-Chicago ("UIC") against then-First Lady Dr. Jill Biden's visit to the campus to celebrate cancer research.⁸⁷ This chapter infamously led chants of the Hamas slogan used at funerals for its suicide bombs, "In blood and martyrdom, we will redeem Palestine," at its "Day of Resistance" protest on October 12, 2023.

114. On January 19, 2024, NSJP joined in organizing a rally with its chapters and affiliates in the University of California system for January 24 and 25, 2024.⁸⁸

⁸⁶ SJP OSU (@sjposu), Instagram, <https://www.instagram.com/p/C12ng8XvU7W/> (Jan. 8, 2024).

⁸⁷ US Palestinian Community Ntwrk (@uspcn), Instagram, <https://www.instagram.com/p/C17e2QPLG2m/> (Jan. 10, 2024).

⁸⁸ BFP at UC Berkeley (@bearsforpalestine), Instagram, <https://www.instagram.com/p/C2SscO5PJFo/> (Jan. 19, 2024).

115. On January 20, 2024, NSJP joined its chapter at Rutgers New Brunswick in publishing a video calling on students, faculty, and staff at Rutgers to join in a divestment protest campaign against the university's administration.⁸⁹

116. On February 6, 2024, NSJP joined in a post by its chapter at Georgetown University announcing the chapter's participation in the "National Day of Action for Divestment" with a student, faculty, and staff walkout event.⁹⁰

117. On February 8, 2024, NSJP joined CUNY 4 Palestine in a call to action to participate in NSJP's "Day of Action for Divestment" through disruptive protests organized by NSJP chapters and affiliates at eight CUNY campuses—Brooklyn College, Hunter College, CUNY Law School, CUNY Graduate Center, City College of New York, John Jay College of Criminal Justice, Queens College, and Borough of Manhattan Community College.⁹¹

118. On February 8, 2024, NSJP released a promotional video it produced with its pro-Hamas collaborators Dissenters and Palestinian Youth Movement celebrating and boosting the protests events by its chapters and affiliates for its "National Day of Action for Divestment," including events by its chapters at CUNY's City College of New York and Hunter College.⁹²

119. On February 12, 2024, NSJP joined its chapter at Claremont University in posting a press release celebrating its accomplishment of getting the school's student senate to vote in favor of a Boycott Divestment Sanction ("BDS") motion targeting Israel's Haifa University.⁹³

⁸⁹ Leah (@riverscrounger.media), Instagram, <https://www.instagram.com/reel/C2VQynHJ88K/> (Jan. 20, 2024).

⁹⁰ Georgetown SJP (@sjpgeorgetown), Instagram, <https://www.instagram.com/p/C3Ag1MXg2Eg/> (Feb. 6, 2024).

⁹¹ CUNY for Palestine (@cuny4palestine), Instagram, https://www.instagram.com/p/C3GUwk4u6PP/?img_index=1 (Feb. 8, 2024).

⁹² National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/reel/C3HCxNG9K/> (Feb. 8, 2024).

⁹³ Claremont SJP (@claremontsjp), Instagram, <https://www.instagram.com/p/C3PS8XiutP5/> (Feb. 12, 2024).

120. On February 13, 2024, NSJP joined its Chicago-area chapter in publishing a video calling for the chapter's activists to force the United States to stop giving aid to Israel "by any means necessary."⁹⁴ The rallying cry of forcing demands on institutions "by any means necessary" was coined and popularized by the radical political activist Malcolm X and directly refers to using violence to achieve political goals.⁹⁵

121. On February 16, 2024, NSJP joined in announcing the union between NSJP chapters at schools across New Jersey into a broader "New Jersey Students for Justice in Palestine Coalition" so that they could better coordinate their disruptive protests.⁹⁶ NSJP also joined in announcing the "Mission Statement and Principles of Unity" of this new group, which explicitly adopted and affirmed "the fundamental principles of the Palestinian struggle agreed upon by the Palestine Liberation Organization in 1977."⁹⁷ The Palestine Liberation Organization has been a designated terrorist organization since 1987 and is specifically proscribed by congressional statute.⁹⁸

122. Over the weekend of February 17-19, 2024, NSJP organized and hosted a "SoCal SJP Retreat" in Los Angeles.⁹⁹ Over 130 students attended from over 15 SJP chapters from schools across Southern California. NSJP's purpose was "to engage in 3 days' worth of organizing skills workshop and discussions to develop the future of the SoCal SJP coalition."

⁹⁴ SJP Chicago (@sjpchicago), Instagram, <https://www.instagram.com/reel/C3TVDK8PN-g/> (Feb. 13, 2024).

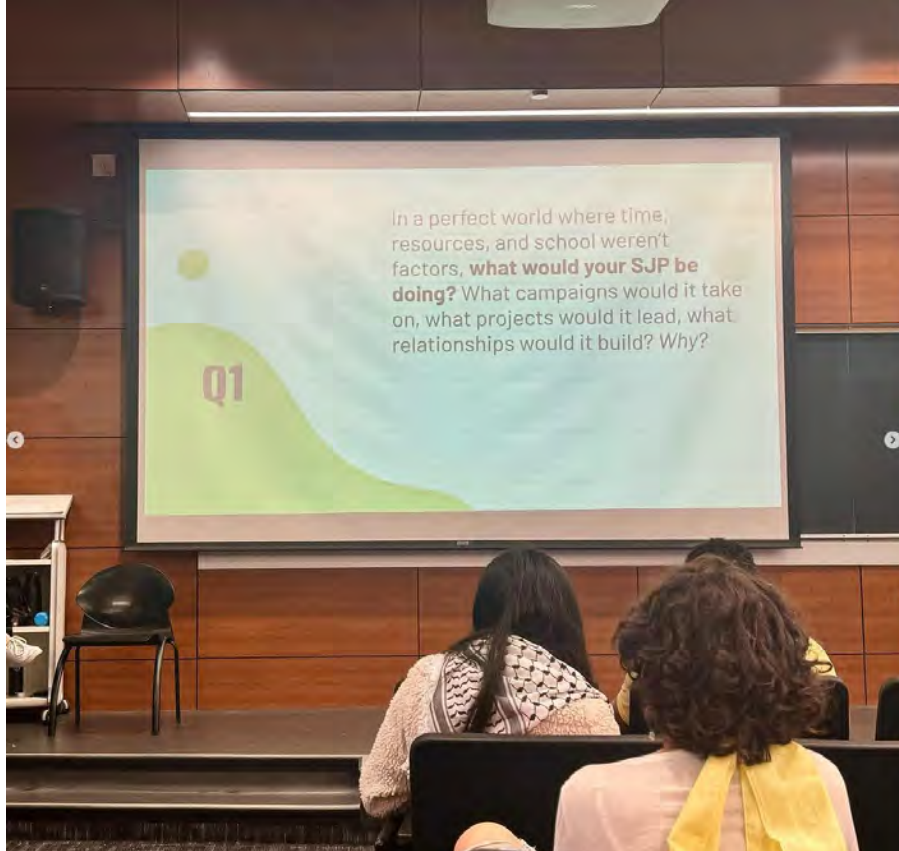
⁹⁵ Adam Pachter, *Any Means Necessary* (accessed Mar. 13, 2025), <https://www.pbs.org/wgbh/americanexperience/features/malcolm-x-any-means-necessary/>.

⁹⁶ New Jersey SJP Coalition (@newjerseysjp), Instagram, <https://www.instagram.com/p/C3ayTYbgdr4/> (Feb. 16, 2024).

⁹⁷ New Jersey SJP Coalition (@newjerseysjp), Instagram, <https://www.instagram.com/p/C3a09HcPIQo/> (Feb. 16, 2024).

⁹⁸ See 22 U.S.C. §§ 5201–02.

⁹⁹ SoCal SJP (@socalsjp), Instagram, <https://www.instagram.com/p/C3qFYSzpieu/> (Feb. 22, 2024).



socaljip and 2 others
Los Angeles, California

socaljip This past weekend, PYM LADOCIE and National SJP held the first ever SoCal SJP Retreat in Los Angeles! With over 130 students in attendance, representing over 15 SJP chapters across Southern California colleges and universities, we convened to engage in 3 days' worth of organizing skills workshops and discussions to develop the future of the SoCal SJP coalition.

Students met with organizers from other schools to share insight and knowledge about their experiences on campus, learned about the history of the student movement for Palestine, and recognized what it means to continue the struggle for a liberated Palestine in the midst of an ongoing genocide. PYM, NSJP, and SoCal SJP all look forward to the coming months, as we continue to strengthen our growing coalition while practicing what we learned this weekend on and off our campuses.

Special thanks to @pitafeast, @bigalspizzeria, and @worldfamousgrill for your generous food donations to help keep students fed and engaged all weekend.

55w

d0min0effect this is beautiful ❤️ thank you for sharing
54w 1 like Reply

uscrcal 🍕🍕🍕🍕
54w 2 likes Reply

daniyahmed I love this!
55w 1 like Reply

skatingflamingo I had such a great time with CSULB SJP at our teach-in last week!
55w 1 like Reply

skatingflamingo This makes me so happy 🍕🍕
55w Reply

remoabboud Amazing! SoCal SJP is so strong!!! 🍕🍕🍕
55w 3 likes Reply

cgs4freepalestine 🍕🍕🍕
55w 4 likes Reply

tassiyah 🍕🍕🍕🍕
55w 2 likes Reply

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socaljip and 2 others
Los Angeles, California

socaljip This past weekend, PYM LADOCIE and National SJP held the first ever SoCal SJP Retreat in Los Angeles! With over 130 students in attendance, representing over 15 SJP chapters across Southern California colleges and universities, we convened to engage in 3 days' worth of organizing skills workshops and discussions to develop the future of the SoCal SJP coalition.

Students met with organizers from other schools to share insight and knowledge about their experiences on campus, learned about the history of the student movement for Palestine, and recognized what it means to continue the struggle for a liberated Palestine in the midst of an ongoing genocide. PYM, NSJP, and SoCal SJP all look forward to the coming months, as we continue to strengthen our growing coalition while practicing what we learned this weekend on and off our campuses.

Special thanks to @pitafeast, @bigalspizzeria, and @worldfamousgrill for your generous food donations to help keep students fed and engaged all weekend.

55w

d0min0effect this is beautiful ❤️ thank you for sharing
54w 1 like Reply

uscrcal 🍕🍕🍕🍕
54w 2 likes Reply

daniyahmed I love this!
55w 1 like Reply

skatingflamingo I had such a great time with CSULB SJP at our teach-in last week!
55w 1 like Reply

skatingflamingo This makes me so happy 🍕🍕
55w Reply

remoabboud Amazing! SoCal SJP is so strong!!! 🍕🍕🍕
55w 3 likes Reply

cgs4freepalestine 🍕🍕🍕
55w 4 likes Reply

tassiyah 🍕🍕🍕🍕
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jatebis 🍕🍕🍕🍕
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123. NSJP joined in announcing a “National Day of Action” on November 16, 2023, by the NSJP chapter at Rutgers Law School in New Jersey, encouraging chapters at law schools across the United States to participate on their own campuses.¹⁰⁰

124. Alongside AMP and NSJP’s direct involvement in organizing and assisting individual NSJP chapters and affiliates, AMP and NSJP continued their role providing national direction, marching orders, and coordination to NSJP’s network of chapters and affiliates.

125. On January 10, 2024, NSJP endorsed a “March On Washington For Gaza” scheduled for January 13, 2024, and ordered its chapters to attend.¹⁰¹

126. On January 16, 2024, NSJP celebrated its chapters for responding to its orders to attend the “March on Washington For Gaza” on January 13, 2024.¹⁰²

127. On January 31, 2024, NSJP ordered its chapters and affiliates to join in a “National Student Day of Action for Divestment” on February 8, 2024.¹⁰³

128. On February 6, 2024, NSJP hosted its third “SJP 101” training session to “provide resources and guidance for laying the foundation for starting an SJP” on campuses.¹⁰⁴

129. On February 11, 2024, NSJP posted a guide for activists in its chapters to overcome student conduct violation charges against them.¹⁰⁵ The guide stated that NSJP “can help provide

¹⁰⁰ National Lawyers Guild-RUN (@nlg.run), Instagram, https://www.instagram.com/p/CzrtaWovl_1/?img_index=1 (Nov. 15, 2023).

¹⁰¹ National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/p/C17rYiHu-m4> (Jan. 10, 2024).

¹⁰² National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/reel/C2L1bnYOf79/> (Jan. 16, 2024).

¹⁰³ National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/p/C2x1Y8Ku5dH/> (Jan. 31, 2024).

¹⁰⁴ See National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/p/C2u3v1jOeSZ/> (Jan. 30, 2024).

¹⁰⁵ National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/p/C3ODdLtOpNe/> (Feb. 11, 2024).

advice & best practices for navigating university administrators and, if applicable, campaigning around student conduct charges” and stated, “We are always a DM away if you need support!” As the post indicates, AMP and NSJP directly communicated with NSJP’s chapters and affiliates through private channels to strategize on how to get away with violating disciplinary rules at their schools through disruptive, often violent, activism perpetrated at AMP and NSJP’s behest.



130. On February 12, 2024, NSJP published a call to action in support of Hamas’s propaganda initiative to pressure Israel to withhold from entering the Hamas stronghold in Rafah.¹⁰⁶ NSJP directed its chapters and affiliates to “mobilize in defense of our people in Gaza.”

¹⁰⁶ National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/p/C3PKTnFMbZp/> (Feb. 12, 2024).

131. On February 13, 2024, NSJP began advertising for a “People’s Conference for Palestine” scheduled for May 24-26, 2024.¹⁰⁷ The conference’s stated purpose was “to strengthen our relationships, our strategies, our tactics, and our unity for the struggle ahead” and “build a shared assessment of the moment, and chart out the next phase of our struggle.”

132. As part of its escalating encouragement and support for unlawful disruptive “protest” activity, on February 15, 2024, NSJP joined in publishing a “protest guide” created by its chapter at the University of Chicago.¹⁰⁸ The guide stated that “disrupting business as usual is a moral imperative in the face of the University’s complicity in genocide,” and directed students to specifically engage in a “disruptive protest” to coerce the University of Chicago into dismissing charges against the chapter’s members for student conduct violations related to their previous disruptive protests.

133. On February 15, 2024, NSJP also announced a new campus protest campaign titled, “Cut Ties With Genocide: Divest Now!” NSJP directed its chapters and affiliates to “turn our mobilization into material gains” and make demands on their universities to “stop funding genocide, stop funding imperialism, cut ties with Israel!” NSJP linked to an intake form for its campus chapters to “join the campaign.” As the post indicates, AMP and NSJP used internal channels to directly strategize with, order, and coordinate NSJP’s chapters and affiliates in this protest campaign to pressure their schools.

¹⁰⁷ Palestinian Youth Movement (@palestiniayouthmovement), Instagram, <https://www.instagram.com/p/C3Tp0DTAs6q/> (Feb. 13, 2024).

¹⁰⁸ SJP UChicago (@sjpuchicago), Instagram, <https://www.instagram.com/p/C3X8j08ro9C/> (Feb. 15, 2024).

134. On February 20, 2024, NSJP ordered its chapters and affiliates to “mobilize” for a “Global Day of Action” on March 2, 2024, in support of Hamas’s goal of preventing Israel from attacking the Hamas stronghold in Rafah.¹⁰⁹

135. On February 28, 2024, NSJP called for all its chapters to participate in “a cross-campus skill share” it had organized with its chapters and affiliates at various campuses.¹¹⁰ NSJP’s purpose for the event was to “discuss the successful campaigns and campaign tactics these chapters have employed, lessons they have for other chapters, and provide space for questions and joint strategizing.”¹¹¹ As the event indicates, AMP and NSJP were directly involved in organizing and training NSJP’s chapters and affiliates in tactics and methods for their disruptive and violent protests and in arranging and cultivating them to undertake joint actions together.

136. On February 29, 2024, NSJP directed its chapters to attend an “emergency action” at Union Square in New York City to protest New York Governor Kathy Hochul at a restaurant where she was speaking.¹¹² The protest descended into violence when some of the 400 protestors encountered police barricades and began attacking police.¹¹³

137. On February 29, 2024, NSJP hosted its fourth seminar providing training and resources for starting new NSJP chapters on campus.¹¹⁴

¹⁰⁹ Palestinian Youth Movement (@palestiniayouthmovement), Instagram, <https://www.instagram.com/palestiniayouthmovement/p/C3lBv2Rgaew/> (Feb. 20, 2024).

¹¹⁰ National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/nationalsjp/p/C36ML1Ms45m/> (Feb. 28, 2024).

¹¹¹ *Id.*

¹¹² National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/p/C38QvwzO6OL/> (Feb. 29, 2024).

¹¹³ Eliza Fawcett, *Pro-Palestinian Rally Becomes Mass Subway Ride to Confront Kathy Hochul*, New York Times (Feb. 29, 2024), <https://www.nytimes.com/2024/02/29/nyregion/wall-street-gaza-protest-hochul.html>.

¹¹⁴ See National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/p/C3nxhlZPvus/> (Feb. 21, 2024).

C. The protests held by NSJP's chapters and affiliates on AMP and NSJP's orders following the October 7th attack were consistently violent, unlawful, and antisemitic.

138. Demonstrating that AMP and NSJP intended for NSJP's chapters and affiliates to engage in violent, unlawful disruptions under their orders and with their support, the protests that AMP and NSJP ordered and assisted with NSJP's chapters and affiliates in executing during this time period were systemically characterized by antisemitic harassment, intimidation, and violence, with a persistent mission of celebrating and normalizing Hamas's terroristic rapes and murders on October 7th:

- **Harvard University:** On October 18, 2023, the Harvard NSJP chapter organized a protest at which one of the chapter's protest "marshals" physically assaulted and harassed an Israeli student.¹¹⁵
- **Cooper Union:** On October 25, 2023, the Cooper Union NSJP chapter organized a protest with an angry mob chasing after Jewish students and holding them hostage in the library while the mob pounded on and bayed at the windows of the room where they took refuge.¹¹⁶
- **Arizona State University:** On November 14, 2023, Arizona State University NSJP chapter members attacked a student government meeting, throwing rocks at the windows of the building while Jewish students were giving testimony about

¹¹⁵ Press Release, representative Elise Stefanik, Stefanik Demands Accountability from Harvard for Failing to Reprimand Antisemitic Students who Assaulted Jewish Student (Apr. 11, 2024), <https://stefanik.house.gov/2024/4/stefanik-demands-accountability-from-harvard-for-failing-to-reprimand-antisemitic-students-who-assaulted-jewish-student>.

¹¹⁶ Jerusalem Post Staff, *WATCH: Cooper Union Jewish students attacked by pro-Palestinian student group*, The Jerusalem Post (Oct. 26, 2023), <https://www.jpost.com/breaking-news/article-770180>.

antisemitism on campus perpetuated by groups like that NSJP chapter.¹¹⁷ Police had to protect the Jewish students from the NSJP chapter.

- **The New School:** On December 4, 2023, NSJP's chapter at The New School made a human blockade of the campus's University Center, using force and violence to prevent students from accessing classes. Leaders of the chapter personally targeted a student they identified as Jewish/Israeli with violence, harassment, and slurs.¹¹⁸ On March 6, 2024, the chapter organized an attack on a campus event featuring a survivor of the October 7th attack. Chapter members banged on walls and doors at the event, called the Jews and Israelis in attendance murderers, chanted NSJP slogans calling for the violent expulsion of Jews from Israel, and attempted to rush the police to mob the speaker and his family when they were leaving the event under police protection.¹¹⁹
- **University of North Carolina:** On October 12, 2023, the University of North Carolina NSJP chapter advertised for a Day of Resistance protest using the template materials from NSJP's Day of Resistance toolkit celebrating the Hamas massacre on the Nova Music Festival, featuring images of Hamas fighters using paragliders. Members of the NSJP chapters threatened Jewish students with knives and the chapter ordered its members to wear masks.¹²⁰

¹¹⁷ *ASU Police investigates disruption at student government meeting after rocks thrown*, KTAR News (Nov. 16, 2023), <https://ktar.com/arizona-news/asu-police-investigates-disruption-at-student-government-meeting-after-rocks-thrown/5549125/>.

¹¹⁸ Rachel Wolf, *NYC university sued, accused of not taking action against antisemitic harassment*, Fox News (Apr. 11, 2025), <https://www.foxnews.com/us/nyc-university-sued-accused-not-taking-action-against-antisemitic-harassment>.

¹¹⁹ Bianca Rodriguez-Mora, Alexiah Syrai Olsen and Olivia Young, *Protesters stage sit-in and march at Arnhold Hall in response to IDF lieutenant presence on campus*, New School Free Press (Mar. 8, 2024), <https://www.newschoolfreepress.com/2024/03/08/protesters-stage-sit-in-and-march-at-arnhold-hall-in-response-to-idf-lieutenant-presence-on-campus/>.

¹²⁰ Peter Reitzes, *SJP Violated UNC's Policies; Why Isn't the Group Suspended?*, the algemeiner (Jan. 2, 2024), <https://www.algemeiner.com/2024/01/02/sjp-violated-uncs-policies-why-isnt-the-group-suspended/>.

- **Columbia University:** On November 10, 2023, Columbia University suspended its NSJP chapter for “threatening rhetoric and intimidation.” As a result of the violently antisemitic hostile environment created at Columbia by NSJP’s chapters and affiliates, Columbia convened a task force on antisemitism. The task force found that in the days immediately following the October 7th attack, the protest movement led by Columbia’s NSJP chapters and affiliates had resulted in, among many other things, protestors spitting on Jewish students, calling them “baby killers” and “genocide lovers,” chasing them off campus at night in attempted attacks, ripping necklaces off their necks, and pinning them against walls and threatening them with violence on the way to or from synagogue.
- **University of Chicago:** On November 9, 2023, members of NSJP’s University of Chicago chapter seized and occupied a building and were arrested for criminal trespass.¹²¹ After a judge released the arrested chapter members, the chapter joined with NSJP in responding to the judge’s statement that they could still protest if they did so lawfully and peacefully by stating, “WE REJECT THIS.”
- **University of Illinois-Chicago (UIC):** UIC’s SJP chapter immediately disseminated flyers for rallies celebrating the October 7th attack using the templates provided by NSJP in its Day of Resistance Toolkit featuring adulatory images of the Hamas terrorists who used paragliders to attack and massacre the Nova Music Festival. At the NSJP chapter’s rally, a chapter member led the crowd in chanting the Arabic slogans

¹²¹ Austin Zeglis, Finn Hartnett, and Nikhil Jaiswal, *UCUP Occupies Admissions Office*, The Chicago maroon (Nov. 9, 2023), <https://chicagomaroon.com/40500/news/breaking-ucup-occupies-admissions-office/>.

used by Hamas at funerals for their suicide bombing operatives: “In blood and martyrdom, we will redeem Palestine!”

- **University of Michigan:** On November 17, 2023, members of NSJP chapter at the University of Michigan broke their way into a campus administrative building and fought with police, injuring two police officers; forty people were arrested.¹²²
- **University of California at Berkeley (UC Berkley):** On February 26, 2024, the NSJP chapters at UC Berkley broke into an event where an Israeli speaker was scheduled to talk to disrupt it and shut it down. In advance of the disruption, the chapter posted on its social media about the event that it would “SHUT IT DOWN.” After the location was changed due to the protests, the chapter ordered its protestors to the new location. The chapter members blocked the venue, smashed its windows, and physically attacked Jewish students who were attending; one student was choked by the chapter’s rioters.¹²³
- **Rutgers University:** On December 12, 2023, Rutgers University suspended its NSJP chapter for criminality, including vandalism.¹²⁴ Rutgers noted that it had “a reasonable basis to conclude that the continued activities by the student organization pose a substantial and immediate threat to the safety and well-being of others.”
- **Temple University:** On December 3, 2023, Temple University’s NSJP chapter mob attacked a restaurant owned by an Israeli Jew, “Goldie’s,” shouting, “Goldie, Goldie,

¹²² Samantha Rich, ‘Who do you serve, who do you protect?’ Nov. 17 protest at Ruthven met with police violence, mass arrests, The Michigan Daily (Nov. 29, 2023), <https://www.michigandaily.com/news/campus-life/who-do-you-serve-who-do-you-protect-nov-17-protest-at-ruthven-met-with-police-violence-mass-arrests/>.

¹²³ Daniel Solomon, *Berkeley Is a Safe Space for Hate*, Tablet (Mar. 17, 2024), <https://www.tabletmag.com/sections/news/articles/berkeley-safe-space-for-hate>.

¹²⁴ Arishita Gupta, *U. suspends New Brunswick chapter of SJP, citing code of conduct violations*, The Daily Targum (last visited Apr. 23, 2025), <https://dailytargum.com/article/2023/12/u-suspends-new-brunswick-chapter-of-sjp-citing-code-of-conduct-violations>.

you can't hide, we charge you with genocide," and vandalized the restaurant's windows.¹²⁵

139. AMP and NSJP condoned and supported the violence, harassment, and violations of law and school policy at the protests, direct actions, and disruptions committed by NSJP's chapters and affiliates under their orders and with their training, resources, and support. This is demonstrated by AMP and NSJP's refusal to condemn *any* of the acts of violence, illegality, or school policy violations by any campus organizations or protestors that were acting according to their calls to action and orders, or that were using their training and resources or the "Students for Justice in Palestine" name.

140. To the contrary, AMP and NSJP consistently publicly defended and maintained support for NSJP's violent and lawbreaking chapters and affiliates, refusing to disavow or distance themselves from any violent or illegal conduct. At no point did AMP and NSJP take any corrective action to cease or avoid supporting violence, illegality, or harassment on campuses. Instead, they consistently protected and valorized and continued to provide support, orders, and encouragement to NSJP's violent and lawbreaking campus organizations, publicly calling for them to be celebrated and free from consequences and then escalating the severity of their calls to action.

141. On November 12, 2023, NSJP publicized an official statement on its website condemning several universities' disciplinary responses to instances of violence, discrimination, and lawbreaking by NSJP chapters and protestors. NSJP focused particularly on Columbia, Brandeis, University of Massachusetts at Amherst, New York University, and Harvard:

Over the past four weeks, National Students for Justice in Palestine has witnessed the most blatant administrative and governmental assault on students' political

¹²⁵ John Paul Titlow, *Gov. Shapiro dines at Goldie three days after pro-Palestinian protest targeted its owner*, Philly Voice (Dec. 6, 2023), <https://www.phillyvoice.com/governor-josh-shapiro-visits-goldie-center-city-philadelphia-protests/>.

speech in recent history. We are deeply concerned with politically-motivated administrative retaliation against individual students and student organizations at universities across North America. This unconstitutional and immoral suppression of our students—students speaking out against the decades-old genocidal depravity of a US vassal state—has cast a dark shadow over our supposedly pluralistic institutions.

American universities pride themselves on providing a diversified, transformative education. Yet, world-renowned institutions, including Columbia University, Brandeis University, and the University of Massachusetts at Amherst, have taken direct action against Palestinian, Jewish, and allied students who have dared to speak out against US participation in the genocide of Palestinians in Gaza. This isn't just an infringement on Palestinian rights; it's a signifier of the erosion of US democracy itself.

The administrative surveillance and targeting of individual students sets an extremely concerning precedent. A student at New York University was suspended for one year for simply tearing down a Zionist propaganda poster on campus. Nearly sixty students at UMass Amherst were arrested and now face disciplinary action for their sit-in, a non-violent protest. Harvard University evicted a Black student from student housing for helping marshal a protest. Across the country, students have been notified that university administrators are coordinating with campus police, state police, and even the Department of Homeland Security to suppress pro-Palestine activism.

Our students' resolve and pursuit of justice remain unmoved by fear of administrative reprisal. As we continue to fight for Palestinian liberation on campus, we call on journalists, reporters, columnists, and academics to use their influential platforms to expose instances of administrative overreach and external pressure. The agendas of political lobbyists and wealthy donors have no place on our university campuses; it's crucial to hold these institutions and their administrative bodies accountable and protect the voices of students facing unjust McCarthyist targeting.

National Students for Justice in Palestine calls on all journalists of conscience to cover these administrator-led recrimination campaigns and wide-scale violations of student and faculty rights. We commend student organizers for steadfastly upholding their political line despite these attempts to silence our righteous fight for justice.¹²⁶

¹²⁶ *University Students Outraged at Blatant Administrative Overreach*, National Students for Justice in Palestine (Nov. 12, 2023), <https://www.nationalsjp.org/statement-14>.

142. Each of these protest actions NSJP was defending and valorizing was conduct that was criminal, violent, and/or a violation of school policies—as previously described for the Columbia, Brandeis, and Harvard chapters. The actions by the individuals in NSJP’s chapters and affiliates at University of Massachusetts at Amherst and New York University were directly criminal. AMP and NSJP directly supported and assisted these criminal actions, including through their tactic of spreading false propaganda narratives—falsely claiming that NSJP’s chapters and affiliates were only engaged in “free expression” and protected speech” and that any punishment against them was “violating their constitutional rights,” when the reality was that they were being arrested or punished for criminal, often violent, conduct:

- **University of Massachusetts at Amherst:** UMass Amherst arrested 57 protestors who illegally occupied the campus’s administration building for trespassing.¹²⁷ The illegal protest involved over 500 participants in a coalition of groups led by the campus NSJP chapter, acting on AMP and NSJP’s orders to stage disruptive direct actions like sit-ins for the Student Week of Resistance. The trespassing direct action employed tactics outlined in NSJP’s toolkits, including role designation among the protestors, disrupting the university’s operations to enforce demands provided by NSJP, and chanting slogans suggested by NSJP—including, “Long live the intifada,” a celebratory call to commit genocide against Jews in honor of Hamas’s previous waves of mass terror attacks on Israeli and Jewish civilians. Protestors told the arresting officers, “kill yourself,” as they were arrested.

¹²⁷ Lucas Ruud and Grace Fiori, *57 protestors arrested at Whitmore sit-in*, Massachusetts Daily Collegian (Oct. 26, 2023), <https://dailycollegian.com/2023/10/57-protestors-arrested-at-whitmore-sit-in/>.

- **New York University:** NYU suspended a student for destroying and vandalizing the property of other students by tearing down and destroying posters of Israeli hostages kidnapped by Hamas, including the young Bibas brothers. The student justified her vandalism by characterizing the images of innocent people and young children kidnapped and murdered by Hamas as “‘propaganda’ used by the mainstream media” to “whitewash the conflict.” NSJP started a national campaign to call NYU’s student conduct administrators to demand her reinstatement, defending and supporting her unlawful destruction of other students’ property by falsely claiming she was being punished for “exercising her constitutionally-protected right to free expression on campus.”¹²⁸

143. AMP and NSJP’s use of propaganda to fabricate and disseminate false narratives that NSJP’s chapters and affiliates’ violent, unlawful, and school-policy-violating actions is nothing more than “free expression” and “protected speech” and that any law enforcement action or punishments against them is a violation of their rights is a primary way that AMP and NSJP directly support and encourage violent, unlawful action by NSJP’s chapters and affiliates.

144. These propaganda campaigns are a powerful tool used by AMP and NSJP to pressure political, law enforcement, and school authorities not to enforce the law or school policies against NSJP’s chapters and affiliates, no matter how blatantly wrong and violent their conduct, thereby giving them freedom of action and freedom of consequences and enabling them to continue engaging in violent and criminal activities. Without the propaganda cover provided by AMP and NSJP in coordination with their pro-Hamas collaborators, NSJP’s chapters and affiliates

¹²⁸ National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/nationalsjp/p/C0w1T4oODXn/?img_index=1 (Dec. 12, 2023).

on campuses across the United States and Canada would be incapable of perpetrating and getting away with their repeated criminal, discriminatory, harassing, violent, and school-policy-violating conduct, as they have for months to years on end.

145. AMP and NSJP's systematic material support for bad action by NSJP's chapters and affiliates is further demonstrated by their defense of violent, criminal, discriminatory, and disruptive conduct at the following campuses: University of Pennsylvania;¹²⁹ New York University;¹³⁰ Rutgers University;¹³¹ University of Chicago;¹³² Columbia University;¹³³ The New School;¹³⁴ Case Western Reserve University;¹³⁵ Kent State University;¹³⁶ University of Michigan;¹³⁷ University of Texas Dallas;¹³⁸ McGill University;¹³⁹ George Washington University;¹⁴⁰ Vanderbilt University;¹⁴¹ University of California Davis;¹⁴² University of California Berkeley;¹⁴³ Stanford University;¹⁴⁴ Emory University;¹⁴⁵ Universities in the Big Ten;¹⁴⁶ Washington University in St. Louis;¹⁴⁷ Pomona College;¹⁴⁸ American University;¹⁴⁹ Emerson College;¹⁵⁰ CUNY;¹⁵¹ Stony Brook University.¹⁵²

¹²⁹ National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/nationalsjp/p/C0p3YjjN4Fx/?hl=en> (Dec. 9, 2023); Penn State Students for Justice in Palestine (@pennstatesjp), Instagram, https://www.instagram.com/pennstatesjp/p/C3swiK9uTAC/?hl=en&img_index=3 (Feb. 23, 2024).

¹³⁰ National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/nationalsjp/p/C0w1T4oODXn/?hl=en&img_index=1 (Dec. 12, 2023); Endowment Justice Collective (rutgersejc), Instagram, https://www.instagram.com/rutgersejc/p/C1DZt_vpoWz/?hl=en (Dec. 19, 2023); Dissenters (@wearedissenters), Instagram, https://www.instagram.com/wearedissenters/p/C54YamQrIxb/?hl=en&img_index=1 (Apr. 17, 2024).

¹³¹ SJP Rutgers-NB (@sjp.rutgersnb), Instagram, https://www.instagram.com/sjp.rutgersnb/p/C0vUVc7sxQb/?hl=en&img_index=1 (Dec. 11, 2023); SJP Rutgers-NB (@sjp.rutgersnb), Instagram, https://www.instagram.com/sjp.nb/p/C0zJfw0OKG3/?hl=en&img_index=1 (Dec. 13, 2023).

¹³² UChicago United for Palestine (@uchicagounited), Instagram, https://www.instagram.com/p/C1F6uo7LAYA/?hl=en&img_index=1 (Dec. 20, 2023).

¹³³ PYM NYC (nycpym), Instagram, https://www.instagram.com/nycpym/p/C5jct8-uzeg/?hl=en&img_index=1 (Apr. 9, 2024).

¹³⁴ New School Students for Justice in Palestine (@tns.sjp), Instagram, https://www.instagram.com/p/C54CR2KO6VQ/?img_index=1 (Apr. 17, 2024).

¹³⁵ CWRU's Students for Justice in Palestine (@cwrusjp), Instagram, https://www.instagram.com/cwrusjp/p/C4ExcC2oIe2/?hl=en&img_index=1 (Mar. 3, 2024); CWRU's Students for Justice in Palestine (@cwrusjp), Instagram, https://www.instagram.com/p/C57htB_ukvf/?img_index=8 (Apr. 19, 2024).

¹³⁶ Students for Justice in Palestine – KSU (@ksusjp), Instagram, https://www.instagram.com/p/C6CqtKPpH2o/?img_index=1 (Apr. 21, 2024).

¹³⁷ TAHRIR Coalition (@tahrirumich), Instagram, <https://www.instagram.com/tahrirumich/p/C2bITPLrLdJ/?hl=en> (Jan. 22, 2024).

- ¹³⁸ National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/nationalsjp/p/C38mdrHPI6v/?hl=en&img_index=5 (Feb. 29, 2024).
- ¹³⁹ SPHR McGill (@sphrmcgill), Instagram, https://www.instagram.com/sphrmcgill/p/C3_dkRaL6j2/?hl=en&img_index=2 (Mar. 1, 2024).
- ¹⁴⁰ Palestine Legal (@pal_legal), Instagram, https://www.instagram.com/pal_legal/p/C4L4rXfJVik/?hl=en&img_index=1 (Mar. 6, 2024); Students for Justice in Palestine at GWU (@sjpgwu), Instagram, https://www.instagram.com/sjpgwu/p/C27uLIOTyJ/?hl=en&img_index=1 (Feb. 4, 2024).
- ¹⁴¹ Vanderbilt Divest Coalition (@vanderbiltdivestcoalition), Instagram, https://www.instagram.com/vanderbiltdivestcoalition/p/C4jIN0_L8Wh/?hl=en&img_index=1 (Mar. 15, 2024); Vanderbilt Divest Coalition (@vanderbiltdivestcoalition), Instagram, https://www.instagram.com/vanderbiltdivestcoalition/p/C4_QojrxK2P/?hl=en&img_index=1 (Mar. 26, 2024); Vanderbilt Divest Coalition (@vanderbiltdivestcoalition), Instagram, https://www.instagram.com/vanderbiltdivestcoalition/p/C5BNDzirDgY/?hl=en&img_index=1 (Mar. 27, 2024); Vanderbilt Divest Coalition (@vanderbiltdivestcoalition), Instagram, https://www.instagram.com/vanderbiltdivestcoalition/p/C5MOvc_RhJj/?hl=en&img_index=1 (Mar. 31, 2024); Vanderbilt Divest Coalition (@vanderbiltdivestcoalition), Instagram, https://www.instagram.com/vanderbiltdivestcoalition/p/C5ZjJpAuTzQ/?hl=en&img_index=1 (Apr. 5, 2024).
- ¹⁴² UC Berkeley Students for Justice in Palestine (@ucb.sjp), Instagram, https://www.instagram.com/ucb.sjp/p/C2iW4aDyP_P/?hl=en&img_index=1 (Jan. 25, 2024); SJP Santa Cruz (@sjpsantacruz), Instagram, https://www.instagram.com/sjpsantacruz/p/C4l4k1tPn_K/?img_index=1 (Mar. 16, 2024).
- ¹⁴³ PYM Bay Area (@bayareapym), Instagram, <https://www.instagram.com/bayareapym/reel/C5khhLkLlpO/?hl=en> (Apr. 10, 2024).
- ¹⁴⁴ Stanford Against Apartheid in Palestine (@sit_in_to_stop_genocide), Instagram, https://www.instagram.com/sit_in_to_stop_genocide/p/C3uEjyguSx/?hl=en&img_index=1 (Feb. 24, 2024).
- ¹⁴⁵ ATL Radical Art Collective (@atlradiart), Instagram, https://www.instagram.com/atlradiart/p/C2gG0yguE5-/?hl=en&img_index=1 (Jan. 24, 2024).
- ¹⁴⁶ SJP OSU (@sjposu), Instagram, https://www.instagram.com/sjposu/p/C2lEyjXvfA5/?hl=en&img_index=5 (Jan. 26, 2024).
- ¹⁴⁷ Resist WashU (@resist.washu), Instagram, https://www.instagram.com/resist.washu/p/C509GEcA9ib/?hl=en&img_index=1 (Apr. 16, 2024).
- ¹⁴⁸ Pomona Divest from Apartheid (@pomonadivestapartheid), Instagram, https://www.instagram.com/pomonadivestapartheid/p/C5Zy5KtJPEA/?hl=en&img_index=1 (Apr. 5, 2024); National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/nationalsjp/p/C5Z2SXVN9bq/?hl=en&img_index=1 (Apr. 5, 2024); Undercurrents (@claremont.undercurrents), Instagram, https://www.instagram.com/claremont.undercurrents/p/C5ccspzLPwO/?hl=en&img_index=1 (Apr. 6, 2024); National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/nationalsjp/reel/C5eRZmPumIY/?hl=en> (Apr. 7, 2024); Claremont SJP (@claremontsjp), Instagram, https://www.instagram.com/claremontsjp/p/C5hm1ZWUM2/?hl=en&img_index=1 (Apr. 8, 2024).
- ¹⁴⁹ AU SJP (@au_sjp), Instagram, https://www.instagram.com/au_sjp/p/C5gdRLAOj-m/?hl=en&img_index=1 (Apr. 8, 2024).
- ¹⁵⁰ Boylston* SJP (@boylstonsjp), Instagram, https://www.instagram.com/boylstonsjp/p/C4yKLntOOLz/?hl=en&img_index=1 (Mar. 21, 2024).
- ¹⁵¹ CUNY for Palestine (cuny4palestine), Instagram, https://www.instagram.com/cuny4palestine/p/C5WAK-ytuxu/?hl=en&img_index=1 (Apr. 4, 2024).
- ¹⁵² Stony Brook Students for Justice in Palestine (@sb4palestine), Instagram, https://www.instagram.com/sb4palestine/p/C5AKryCusVY/?hl=en&img_index=1 (Mar. 26, 2024); Stony Brook Students for Justice in Palestine (@sb4palestine), Instagram, https://www.instagram.com/sb4palestine/p/C5YyKm0x-Iv/?hl=en&img_index=1 (Apr. 5, 2024).

VI. After AMP and NSJP groomed NSJP’s campus organizations for violence and unlawful action, they launched their second phase: the encampment operation.

146. After months of organizing, training, leading, and normalizing disruptive and radical protests across the nation involving violence and violations of law and campus rules by NSJP’s chapters and affiliates, AMP and NSJP had laid sufficient groundwork for the second phase of their campus operations: the hostile and violent seizure of campus common spaces and disruption of school operations through unlawful “encampments.”

A. Overview of AMP and NSJP’s encampment operation.

147. AMP and NSJP’s encampment operation was a centrally planned campaign to use NSJP’s chapters and affiliates to bring massive coercive power to bear against schools and broader American civil society through violently and unlawfully taking over campuses across the country for the explicit purpose of obstructing school operations until NSJP’s demands were met. AMP and NSJP planned, directed, and ordered the encampment operation, commanding NSJP’s chapters and affiliates to engage in it by following a model set by NSJP’s chapters and affiliates at Columbia, and providing resources to enable them to execute NSJP’s orders.

148. A key component of AMP and NSJP’s encampment operation was directing and supporting NSJP’s chapters and affiliates in using violence in “defense” of the encampments against law enforcement, school security personnel, and all other perceived “threats” to the encampments’ continued operation—including counter-protestors exercising their free-speech rights and innocent bystanders—so that the encampments and their pressure on schools could be maintained for as long as possible and so that their disruption and damage to school operations and property could be maximized.

149. A persistent feature of AMP and NSJP’s encampments was mass antisemitic and anti-Israeli discrimination, harassment, and bigotry. Violence perpetrated by NSJP chapters and

affiliates occupying campus encampments against so-called “Zionists” at their schools—i.e., Jews, Israelis, and anyone else that antisemitic protestors in NSJP’s chapters and affiliates wanted to target—was commonplace and a major factor in schools across the country cooperating with law enforcement to forcefully shut down the encampments for the safety of their communities.

150. Consistently, and with direct encouragement, logistical support, reinforcements, and propaganda cover from AMP and NSJP and their pro-Hamas collaborators, NSJP’s chapters and affiliates physically resisted and obstructed law enforcement efforts to shut down their encampments. They engaged in coordinated attacks, human blockades, and other violent criminal acts in carrying out AMP and NSJP’s orders to “defend” the encampments they had created to “seize” their campuses in service of AMP and NSJP’s pro-Hamas mission.

151. At every turn, AMP and NSJP directly supported, encouraged, and promoted the violence and criminality by NSJP’s chapters and affiliates. Despite the nationwide criminality, violence, and antisemitic conduct by the NSJP chapters and affiliates operating encampments under their orders, AMP and NSJP *never* disavowed, disapproved of, or distanced itself from *any* of this conduct, no matter how heinous, discriminatory, illegal, or violent. Instead, AMP and NSJP continued to support, encourage, and valorize NSJP’s chapters and affiliates’ conduct in every instance, specifically publicizing and commending the most violent and radical chapters and holding them up as examples for all their other chapters to emulate.

152. As with the protests in phase one of AMP and NSJP’s post-October 7th operations, AMP and NSJP provided direct support to their chapters and affiliates’ violent and illegal conduct, providing them orders, coordination, resources, training, and guidance for creating, maintaining, and “defending” the encampments. AMP and NSJP also directly supported the chapters and affiliates’ unlawful action by engaging in public relations and protest campaigns to defend them

from legal and disciplinary consequences. In doing so, AMP and NSJP again employed the tactic of spreading knowingly false narratives that NSJP's chapters and affiliates were being attacked and shut down by police and schools for engaging in "protected speech" or for "exercising their rights," while covering up and lying about the chapters and affiliates' mass acts of violence against law enforcement and "Zionists," property destruction, and antisemitic discrimination.

153. On information and belief, AMP and NSJP coordinated with their pro-Hamas collaborators to have them assist in the encampment operation, as demonstrated by the persistent and prominent role of AMP and NSJP's pro-Hamas collaborators in using their reach and resources to directly add to AMP and NSJP's efforts to direct, mobilize, defend, supply, and propagandize on behalf of the NSJP chapters and affiliates creating and running the violent encampments.

B. AMP and NSJP collaborated with NSJP's Columbia chapters and affiliates to launch the encampment operation at Columbia.

154. AMP, NSJP, and NSJP's Columbia chapters created and maintained the operation's first encampment at Columbia in collaboration with NSJP's chapters and affiliates at CUNY. NSJP's CUNY and Columbia chapters and affiliates work with one another closely, consistently coordinate their efforts and messaging and come to one another's "defense" against school administrations and law enforcement. Their coordination was exemplified on April 30, 2024, when NSJP's CUNY and Columbia chapters and affiliates united for a sustained riot across their campuses, coordinating seizure of buildings on their respective campuses and assaults on police, causing millions of dollars in damage. Together, AMP and NSJP and NSJP's CUNY and Columbia chapters and affiliates collaborated closely in developing the Columbia encampment—and later the CUNY encampment—using it as a model to launch NSJP's nationwide encampment operation.

155. In advance of launching the first encampment, AMP, NSJP, and CUAD collaborated with AMP and NSJP's allied pro-Hamas organizations Samidoun and Within Our Lifetime to organize a training seminar with terrorists for CUAD's members.

156. Samidoun is a "sham charity that serves as an international fundraiser for the Popular Front for the Liberation of Palestine (PFLP) terrorist organization."¹⁵³ PFLP is a designated Foreign Terrorist Organization and a Specially Designated Global Terrorist. The United States has recognized both Samidoun and a senior member of PFLP's leadership, Khaled Barakat, as terrorists.¹⁵⁴ PFLP is a close ally of Hamas and directly took part in the October 7th attack,¹⁵⁵ and has attacked Israeli civilians for decades, including murdering four rabbis with meat cleavers in a Jerusalem synagogue and murdering a 17-year-old Israeli girl while she was hiking.

157. Within Our Lifetime, like AMP and NSJP, is an ally of Hamas that serves its interests through propaganda and exerting pressure on American civil society through disruptive, riotous, and often unlawful protest actions. There is strong reason to believe that Within Our Lifetime is controlled or operated by AMP: Within Our Lifetime was initially the New York City Students for Justice in Palestine chapter and was rebranded to its present incarnation in 2018 to expand its operations;¹⁵⁶ it continues to work closely with AMP and NSJP in service of a shared mission to aid Hamas. Within Our Lifetime and its leadership have consistently incited and led violence against Jews and Israelis in connection with their protest activities.¹⁵⁷

¹⁵³ Press Release, U.S. Department of the Treasury, United States and Canada Target Key International Fundraiser for Foreign Terrorist Organization PFLP (Oct. 15, 2024), <https://home.treasury.gov/news/press-releases/jy2646>

¹⁵⁴ *Id.*

¹⁵⁵ *PFLP Involvement in the October 7 Atrocities*, NGO Monitor (Jan. 30, 2024), <https://ngo-monitor.org/reports/pflp-involvement-in-the-october-7-atrocities/>.

¹⁵⁶ *Within Our Lifetime*, Canary Mission (last visited Apr. 1, 2025), https://canarymission.org/organization/Within_Our_Lifetime.

¹⁵⁷ *Within Our Lifetime: The NYC Org Inciting its Activists to Violence*, Canary Mission (last visited Mar. 26, 2025), https://canarymission.org/campaign/NYC_Antisemitic_Violence.

158. This event, titled “Resistance 101,” was led by Charlotte Kates, a coordinator for Samidoun, Khaled Barakat, senior leader of PFLP, recognized terrorist, and husband to Kates,¹⁵⁸ and Sean Eren,¹⁵⁹ a member of the NSJP Steering Committee. The event featured Kates and Barakat glorifying Hamas—“there is nothing wrong with being a member of Hamas, being a leader of Hamas, being a fighter in Hamas”—praising the October 7th attack for changing the world by showing what terrorism could accomplish, praising Iran for building a terrorist network of “resistance” to “free the region” from Israel and the United States, and instructing students on how to organize to be a meaningful part of Iran, Hamas, and Hezbollah’s “global front of resistance” and how to “be of service” in their fight against “Zionism” and “U.S. imperialism.” A CUAD leader at the event indicated CUAD’s role as AMP and NSJP’s vanguard in the student protest movement, telling fellow CUAD members they should feel proud for paving the way for fellow protest groups to publicly praise the October 7th attack and Hamas at Columbia because they “got away with it” without punishment from Columbia and “got support for it” on campus.

159. As demonstrated by NSJP Steering Committee Member Sean Eren’s participation in the event, NSJP was directly involved in arranging for its chapters and affiliates to learn from and collaborate with terrorists on how their NSJP activism could “be of service” to Iran, Hamas, and Hezbollah’s anti-American, antisemitic terrorism in advance of the upcoming encampment operation.

160. On April 17, 2025, AMP and NSJP coordinated with NSJP’s flagship chapters at Columbia to create NSJP’s first encampment. The encampment at Columbia was launched in a

¹⁵⁸ Isabel Vincent and Dana Kennedy, *Pro-terror radical launched 2-hour anti-Israel tirade at Columbia University event weeks before protests exploded: ‘Nothing wrong with being a Hamas fighter’*, New York Post (Apr. 24, 2024), <https://nypost.com/2024/04/24/us-news/palestinian-radical-at-columbia-nothing-wrong-with-hamas/>.

¹⁵⁹ Sean Eren, Canary Mission (last modified Apr. 08, 2025), https://canarymission.org/individual/Sean_Eren.

manner that reflected foresight, planning, resources, training, and direction by professional organizers—strongly suggesting NSJP’s direct involvement. The encampment was swiftly and skillfully set up and arranged, the majority of the tents appeared to come from the same external source, and the protestors were ready with expensive banners and signage and demonstration materials indicative of outside funding and collaboration: evidence that, in the opinion of professional protest organizer, indicated that the encampment was professionally organized with outside assistance:¹⁶⁰



¹⁶⁰ Germania Rodriguez Poleo and Maryann Martinez, *Who’s really behind the campus protests? Expensive tents, giant banners and adult agitators who have nothing to do with the schools where they’re causing anarchy make expert think the uproar in America is a ‘professional job’*, Daily Mail (May 1, 2024), <https://www.dailymail.co.uk/news/article-13371707/Columbia-university-protests-ceo-crowds-demand-tents-banners.html>; Judy Goldstein and Joseph Zuloaga, *In Focus: The first 24 hours of the ‘Gaza Solidarity Encampment’*, Columbia Spectator (Apr. 18, 2024), <https://www.columbiaspectator.com/main/2024/04/18/in-focus-the-first-24-hours-of-the-gaza-solidarity-encampment/>; Isha Banerjee, *Timeline: The ‘Gaza Solidarity Encampment’* (May 2, 2024), <https://www.columbiaspectator.com/news/2024/05/02/timeline-the-gaza-solidarity-encampment/>



161. On April 17, 2025, NSJP and CUNY for Palestine joined NSJP’s pro-Hamas collaborators in a call to action to “support the historic Gaza Solidarity Encampment at Columbia University” by protecting it, dropping off food, contributing art and signs, sending money for legal fees and supplies, and sending messages to Columbia faculty encouraging them to hold their classes in the encampment:¹⁶¹

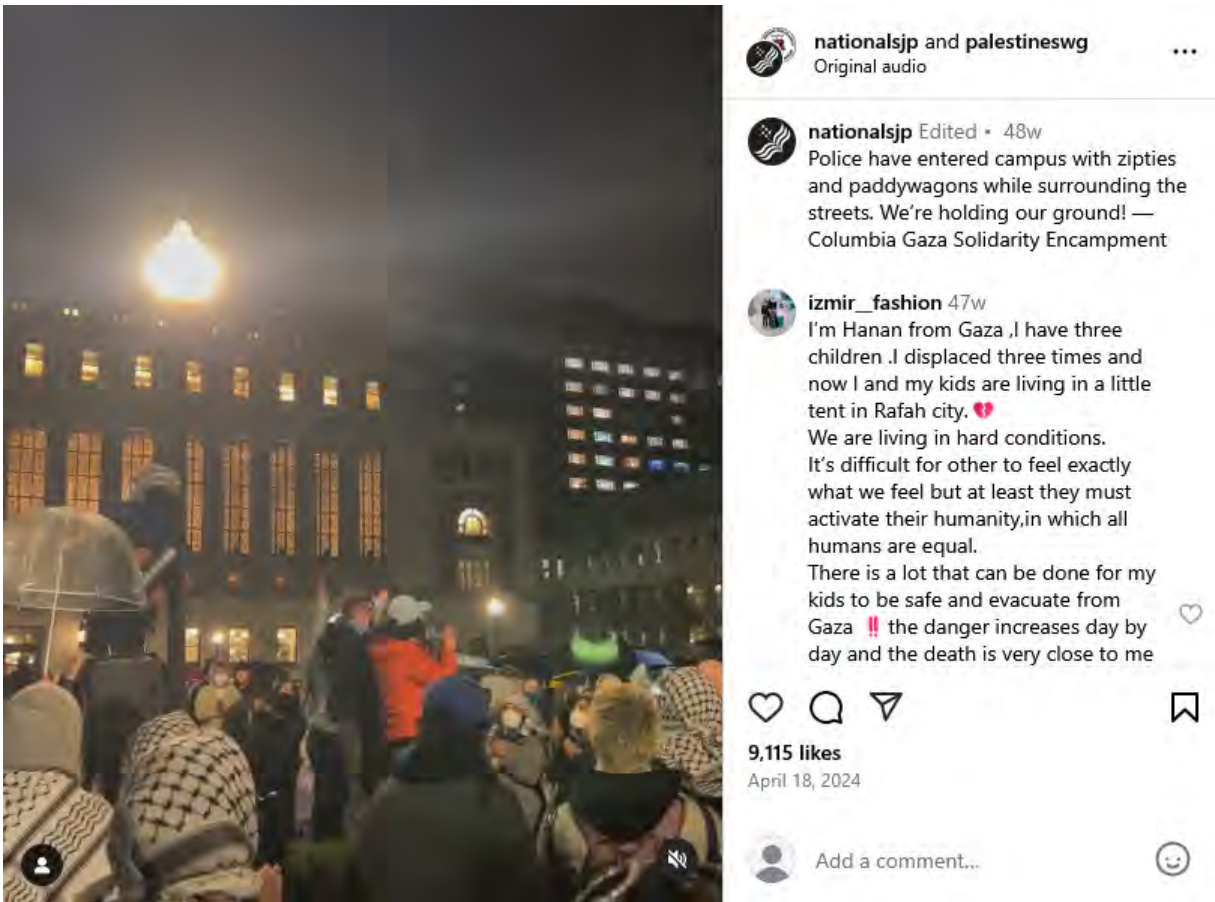
¹⁶¹ The People’s Forum (@peoplesforumnyc), Instagram, https://www.instagram.com/p/C537oNbAXP4/?img_index=3 (Apr. 17, 2024).



<p>1. PROTECT THE ENCAMPMENT Show up to surround and protect the encampment. We are stronger together. There is power in numbers, we protect us!</p> <p>2. FOOD DROP OFF Food is welcome to be dropped off at the encampment. Bring to a liaison on the outskirts of the encampment.</p> <p>3. ART/SIGNAGE DROP OFF Bring art or signs to support Palestine & divestment/opposition of Zionism. Cover the lawn in solidarity art!</p> <p>4. VENMO Help support legal fees, supplies, and more. Venmo @bcabolitioncollective</p>	<p>5. EMAIL Send emails to professors, using the template via @cuapartheiddivest—encouraging them to hold class on the lawn in solidarity with the encampment</p> <p>6. FOLLOW/SHARE Follow & share posts from: @cuapartheiddivest @sjp.columbia @columbia_msa</p>
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162. On April 18, 2025, NSJP indicated its direct involvement with the Columbia encampment and its violations of the law and resistance against law enforcement, publishing a

message indicating NSJP's presence at the encampment and its coordination with its Columbia chapters and affiliates to continue "holding our ground!" against the police.¹⁶²



163. NSJP posted footage of its affiliated protestors resisting arrest and assaulting police at the Columbia encampment with another message indicating NSJP's direct involvement in the encampment's operation, issuing a call to action for "community members to !! SHOW UP IN DROVES !! at Columbia to continue keeping each other safe" by achieving the "critical mass" of protestors needed to resist the police.¹⁶³

¹⁶² National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/p/C5448FhsQcY/> (Apr. 18, 2024).

¹⁶³ National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/p/C555a6XusMg/> (Apr. 18, 2024).



nationalsjp and 2 others
Original audio



nationalsjp 48w

We begin Day 2 of the Columbia Encampment with police (the Strategic Response Group) violently arresting at least 5 of our courageous comrades outside of the campus gates, who had weathered the rain and slept on the streets in solidarity with us through the night.

Today is a new day, and we ask our community members to **!! SHOW UP IN**



12,497 likes
April 18, 2024



Add a comment...



nationalsjp and 2 others
Original audio



nationalsjp We begin Day 2 of the Columbia Encampment with police (the Strategic Response Group) violently arresting at least 5 of our courageous comrades outside of the campus gates, who had weathered the rain and slept on the streets in solidarity with us through the night.

Today is a new day, and we ask our community members to **!! SHOW UP IN DROVES !!** at Columbia to continue keeping each other safe! Like the cowards they are, the pigs waited until early morning to attempt to detain us.

Please spread the word about this on Instagram, Twitter, Signal, etc. to ensure we have the widest reach for continued calls for support. Numbers truly do matter— a critical mass is what we need to maintain, both inside and outside campus. — Columbia Gaza Solidarity Encampment

164. NSJP then engaged in a flurry of activity on April 18, 2024, directly and materially supporting the Columbia encampment: marshalling resources and mobilizing reinforcements to resist law enforcement, directing its campus chapters and affiliates to support the violent, disruptive encampment at Columbia, and propagandizing and agitating on behalf of its Columbia

chapters and affiliates to prevent their discipline, arrest, and prosecution for violating laws and school policies.

165. NSJP coordinated with its pro-Hamas collaborators—The People’s Forum, ANSWER Coalition, and Palestinian Youth Movement and its New York City chapter, Palestinian Youth Movement NYC—to publish an “emergency call to action” to “join the picket” to support the Columbia encampment.¹⁶⁴



166. In response to a campus-wide email from Columbia’s then-president, Minouche Shafik, warning NSJP’s encampment protestors that the New York Police Department would be

¹⁶⁴ The People’s Forum (@peoplesforumnyc), Instagram, <https://www.instagram.com/p/C56S9h-gohy/> (Apr. 18, 2024).

sweeping and dismantling the encampment that evening due to the protestors violating “a long list of rules and policies,” NSJP called on the protestors to stay in the encampment in resistance against the police and Columbia.¹⁶⁵

167. NSJP then published a message stating it stood “in full solidarity with CUAD and Barnard’s student organizers” and called on all its chapters and affiliates to fund CUAD’s legal fees, protest in support of the encampment the following day, and “amplify CUAD’s social media posts and demands.”¹⁶⁶



¹⁶⁵ National Students for Justice in Palestine (@nationalsjp), <https://www.instagram.com/p/C56VlobORaE/> (Apr. 18, 2024).

¹⁶⁶ National Students for Justice in Palestine (@nationalsjp), https://www.instagram.com/p/C56s95Yupfb/?img_index=1 (Apr. 18, 2024).

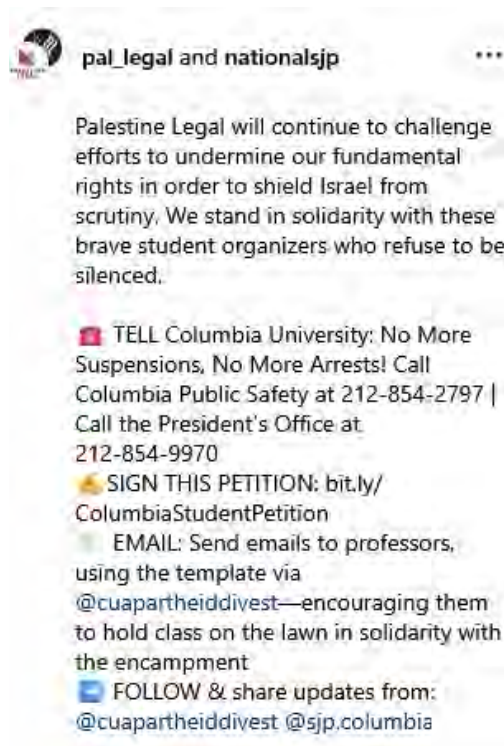
168. NSJP joined CUAD in calling for students to continue unlawfully rallying on Columbia's campus to demand that Columbia drop the charges against the protestors who were arrested for refusing to leave the encampment and to also demand that Columbia no longer request law enforcement assistance in dealing with the protestors' unlawful behavior:¹⁶⁷



169. NSJP joined Palestine Legal in celebrating the “bold escalation” by NSJP’s protestors at Columbia and calling on NSJP chapters and affiliates to support the encampment protestors:¹⁶⁸

¹⁶⁷ CUAD’s Instagram posts are presently unavailable because Meta—the company that owns and operates Instagram—disabled CUAD’s account for promoting violence. See Michael Starr, *Columbia anti-Israel org. Instagram account disabled amid crackdown on university*, The Jerusalem Post (Apr. 2, 2025), <https://www.jpost.com/bds-threat/article-848570>.

¹⁶⁸ Palestine Legal (@pal_legal), Instagram, https://www.instagram.com/p/C562N91StkW/?img_index=1 (Apr. 18, 2024).



170. NSJP announced it was holding a “press conference for Gaza Solidarity Encampment” with CUAD.

171. After Columbia successfully shut down this iteration of the encampment on its campus—NSJP’s chapters and affiliates established other encampments at Columbia in the days that followed—NSJP joined in publishing a post excoriating Columbia for shutting the encampment down, using inflammatory, martial rhetoric calling on student protestors to “struggle” against their universities and threatening that “Columbia will not know peace until students’ demands are met.”¹⁶⁹

172. NSJP then published video of its “Press Conference for Gaza Solidarity Encampment.”¹⁷⁰ Answering questions on behalf of the encampment was Mahmoud Khalil, a foreign graduate student who is currently in the process of being deported for supporting Hamas’s terrorism in connection with his leadership of CUAD’s activities at Columbia.

173. NSJP then joined in disseminating a social media post by one of the Columbia students who participated in the encampment and was arrested, declaring her resolve to continue disruptive protests as part of the movement NSJP and its chapters had created.¹⁷¹

C. AMP and NSJP launched the encampment operation across NSJP’s network.

174. On April 19, 2025, after using the Columbia encampment as a trial run and propaganda flashpoint to galvanize the rest of NSJP’s chapters and affiliates, AMP and NSJP initiated their nationwide encampment operation. NSJP called “on all SJPs across the nation to take back the university and force the administration to divest, for the people of Gaza!”¹⁷² NSJP stated it would follow up on this public message with secret internal communications to coordinate,

¹⁶⁹ PYM NYC (@nycpym), Instagram, https://www.instagram.com/p/C56-daKMtUJh/?img_index=5 (Apr. 18, 2024).

¹⁷⁰ National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/p/C56-5B_MjJe/ (Apr. 18, 2024).

¹⁷¹ PYM NYC (@nycpym), Instagram, <https://www.instagram.com/p/C57DTumtNuu/> (Apr. 18, 2024).

¹⁷² National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/p/C580sAZONce/> (Apr. 19, 2024).

direct, and prepare its chapters to take over their campuses with disruptive, illegal encampments just like the encampment at Columbia, stating, “BE READY FOR AN INTERNAL CALL FOR IMMEDIATE NEXT ACTION ITEMS! REPOST ON YOUR SOCIALS TO CIRCULATE THIS NATIONAL CALL TO ACTION.”¹⁷³ As the post indicates, AMP and NSJP directly and privately communicated with NSJP’s chapters and affiliates to strategize with them and direct them in creating violent, disruptive encampments at their schools:



175. On April 20, 2025, NSJP formally announced the encampments as its newest mass mobilization project: the “Popular University for Gaza.”¹⁷⁴ AMP and NSJP use the term “Popular

¹⁷³ *Id.*

¹⁷⁴ *National SJP Launches the Popular University for Gaza*, National Students for Justice in Palestine (Apr. 20, 2024), <https://www.nationalsjp.org/statement-16>.

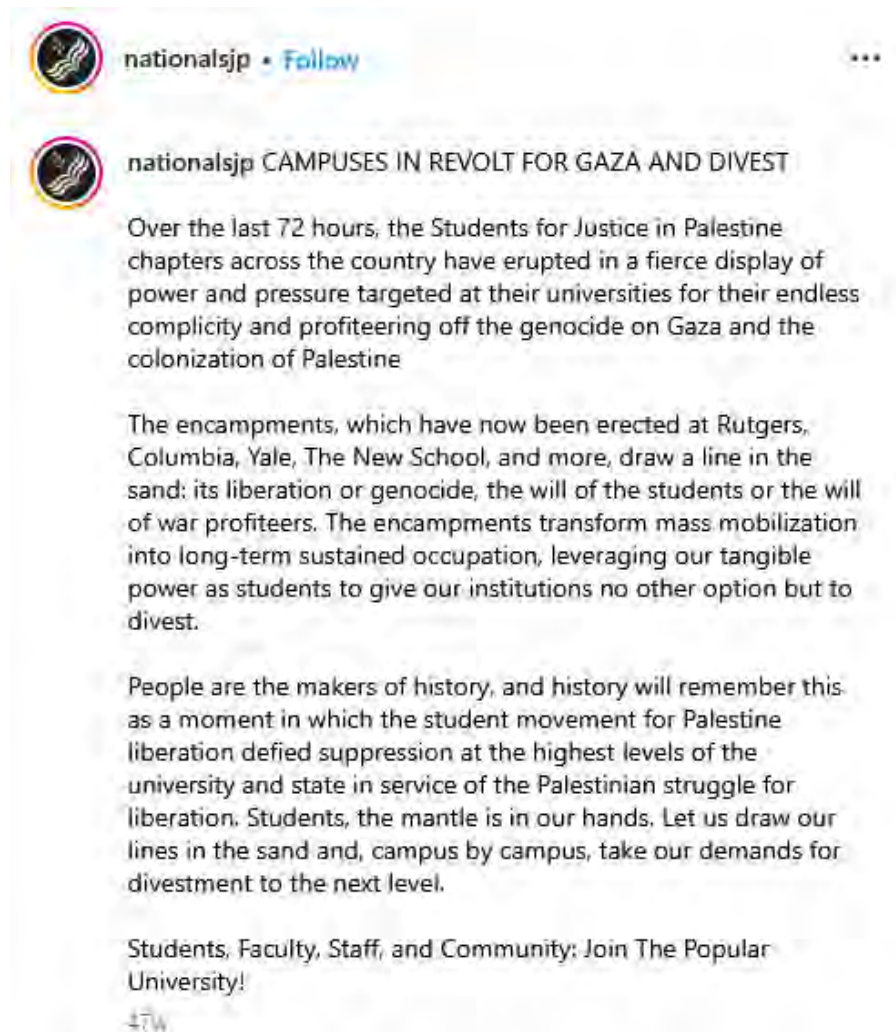
University” as their name for the encampments. Alongside the “Popular University” name, AMP and NSJP devoted resources to create branding specific to the encampment project to market it more effectively and unify NSJP’s chapters and affiliates’ encampment operations.¹⁷⁵ In ordering its chapters and affiliates to engage in the Popular University project, NSJP used violent, martial rhetoric of revolution, stating, “we will seize our universities and force the administration to divest, for the people of Gaza! Join the popular university, take back our institutions!”



176. On April 21, 2025, NSJP continued with the martial, violent rhetoric in commands to its chapters and affiliates to create encampments as part of the Popular University project, referring to campuses where its chapters and affiliates had created encampments as “campuses in

¹⁷⁵ National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/p/C5_GEIWuo0D/ (Apr. 20, 2024)

revolt” and referring to their creation as “a fierce display of power and pressure targeted at their universities.”¹⁷⁶



177. NSJP also published an “Open Letter from SJP to American Universities,” threatening to takeover and forcefully cease all campus operations until NSJP’s demands were met.¹⁷⁷

¹⁷⁶ National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/p/C6CMk9oOPcF/> (Apr. 21, 2024).

¹⁷⁷ *Open Letter from SJP to American Universities*, National Students for Justice in Palestine (Apr. 21, 2024), <https://www.nationalsjp.org/statement-17>.

OPEN LETTER FROM SJP TO AMERICAN UNIVERSITIES

April 21, 2024

To our universities,

We, the Student Movement for Palestinian Liberation, demand institutional accountability and immediate divestment from israel and its genocide of the Palestinian people of Gaza. As our Palestinian counterparts face the systematic eradication of their homes, holy sites, and universities, the assassination of their professors, peers, and families, and the seizure of their homeland, we stand resolutely with their struggle for liberation.

We as students will reclaim our power on campus—there will be no classes or compliance with our institutions so long as their shameless profiteering off of our genocide persists. Through the student movement for a Popular University, we will transform our mass mobilization into sustained, tangible power—we will not stop until our universities divest and Palestine is free.

The strength of our political conviction is proven by the lengths our institutions have gone to suppress our movement. For the last six months, our universities have arrested, expelled, suspended, and threatened us, de-chartered our organizations, and engaged in anti-Arab and Islamophobic hate speech. They believe they can suppress our struggle for Palestinian freedom; *we disagree*.

University administrators and boards of trustees have drawn their line in the sand: profit and reputation are more important than the lives of Palestinians and the will of their students. This only fuels our political clarity—as the united mass of students, faculty, and staff face the true nature of our institutions, we release this open letter with an unrelenting message: **we will not rest till our universities divest**.

Empowered by the strength of students and SJPs at columbia, rutgers, yale, stanford, and beyond, Popular University For Gaza reflects our steadfast conviction for the liberation of Palestine, our unity as students, and our commitment to divestment. We demand an end to institutional investment in the colonization of Palestine and institutional repression of our movement. We firmly reject the idea that these settler colonial institutions, whose existence is predicated on the dispossession and disenfranchisement of the indigenous peoples of Turtle Island, represent us. We will **take back** our universities to pursue true justice and liberation for all.

It is with this commitment that we announce our dedication to the mission and vision of Popular University for Gaza, a demonstration of our indivisible strength and unity as students. As we across Turtle Island (the so-called united states and canada) and around the world establish encampments and popular, liberated spaces on our campuses, we are united in the following mission:

- To completely divest our tuition dollars from—and to cut all institutional ties to—the zionist entity as well as all companies complicit in the colonization of Palestine.
- To stand with our friends, relatives, and colleagues in Palestine as they resist zionist attempts to exterminate our people.
- To re-forge a university divorced from the fundamentally immoral economic and political system of the united states—to create a place in which teaching and learning happen for the benefit of the masses and the global community.

The Student Movement is mobilized, unified, and determined to achieve our demands for Palestinian liberation and an end to the genocide in Gaza. We will seize control of our institutions, campus by campus, until Palestine is free.

178. NSJP issued a call to action with one of its pro-Hamas collaborators, Palestinian Youth Movement, calling on Boston-area schools—Emerson, Tufts, MIT—to join Columbia, Yale, and others in creating encampments to “seize control of [their] campuses until PALESTINE IS FREE!”¹⁷⁸

179. NSJP joined with Palestinian Youth Movement and its New York City focused coalition partner, The People’s Forum, in issuing similar orders to all students in New York City, calling on them to “reclaim[] their campuses,” “join us in supporting the students at [NYU, Columbia, and The New School],” “rally in support of the encampment movement,”¹⁷⁹ engage in “a political orientation to get grounded on the current situation on the ground in Palestine [and] a discussion on the current student movement,” and make plans for “mobilizations [i.e. establishing and defending encampments] in the week ahead!”¹⁸⁰

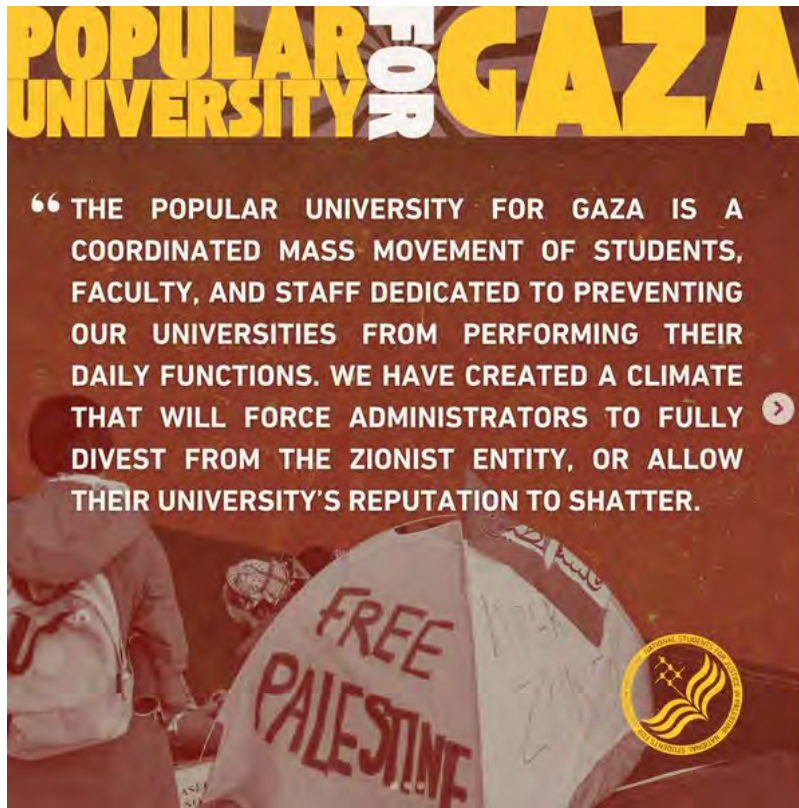
180. On April 22, 2025, NSJP published a series of posts in which it declared AMP and NSJP’s underlying goal for the Popular University project: to use NSJP’s chapters and affiliates and their encampments to violently and unlawfully disrupt schools so severely that they would cease to function and thereby be coerced into surrendering to AMP and NSJP’s pro-Hamas demands.¹⁸¹

¹⁷⁸ Palestinian Youth Movement (@palestinyouthmovement), Instagram, https://www.instagram.com/p/C6C37ifAV7d/?img_index=1 (Apr. 21, 2024).

¹⁷⁹ PYM NYC (@nycpym), Instagram, https://www.instagram.com/nycpym/p/C6ElcJ_OJf8/?img_index=1 (Apr. 22, 2024).

¹⁸⁰ The People’s Forum (@peoplesforumnyc), Instagram, https://www.instagram.com/p/C6C_rpbA_Ic/ (Apr. 21, 2024).

¹⁸¹ National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/p/C6E0DYXuWs8/?img_index=1 (Apr. 22, 2024).





181. NSJP also issued a “mission statement” for its Popular University project, again directly stating that the purpose of the encampments was to use coercive force to violate school policies, refuse to comply with law enforcement, and stop all educational function until its demands were met.¹⁸² NSJP used martial, violent, and revolutionary rhetoric to cast its orders to its chapters and affiliates in life and death terms as part of a broader war effort against Israel, ending its mission statement with the declaration, “We will seize control of our institutions, campus by campus, until Palestine is free.” In using this framing, AMP and NSJP directly connected their Popular University project and the encampments to Hamas’s war against Israel:

¹⁸² National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/p/C6EQ0r1ulpM/?img_index=1 (Apr. 22, 2024).





182. As these posts demonstrate, AMP and NSJP's explicit purpose in planning the encampment operation and then ordering and supporting NSJP's chapters and affiliates in executing it was to use the encampments to force schools to bend the knee to AMP and NSJP's pro-Hamas demands through violence and mass disruption. The violence and illegality of the encampments were not incidental excesses unintended and undesired by AMP and NSJP, but the

core of AMP and NSJP's purpose in ordering the encampments' creation—so that AMP and NSJP could have NSJP's chapters and affiliates “seize” control over their campuses until AMP and NSJP's demands were met.

183. As a result of AMP and NSJP's national calls to action and the resources, training, directions, and coordination they provided, NSJP chapters and affiliates across the country created disruptive encampments on their campuses and resisted and attacked law enforcement as ordered. AMP and NSJP publicized, supported, celebrated, and directed resources to the encampments established by NSJP's chapters and affiliates. AMP and NSJP's support for the encampments included not only directing and supporting their creation but working to defend their unlawful behavior and violation of campus policies against law enforcement and school administrators.

184. As a result of AMP and NSJP's systematic campaign of training, directing, and supporting NSJP's chapters and affiliates in engaging increasingly more illegal, disruptive, and violent behavior, and defending them with propaganda campaigns when they engaged in unlawful and violent conduct, AMP and NSJP primed the students and protestors in NSJP's chapters and affiliates to use force against perceived “threats” to their protest actions and encampments, instilling them with confidence that AMP, NSJP, and their pro-Hamas coalition partners would support and defend them from consequences.

185. The following is a non-exhaustive list of examples of AMP and NSJP's direct support for encampments created by NSJP's chapters and affiliates and their related violent activities, including AMP and NSJP's mobilization of resources to assist with violently “defending” the unlawful encampments from law enforcement action and their use of propaganda to agitate against legal and disciplinary consequences for the chapters' violence:

- **Yale:** On April 19, 2024, NSJP and AMP joined their respective Yale chapters and affiliates in a celebratory post announcing they had created an encampment, that their protests related to the encampment were so disruptive they had forced a dinner for Yale’s board of trustees to end early, and that their protestors were prepared to resist the police.¹⁸³ On April 20, 2024, NSJP joined in a call to mobilize defenders to the encampment and a call for supplies and allies to stock the encampment.¹⁸⁴
- **Barnard:** On April 20, 2024, NSJP joined in a call to action from CUAD to pressure the administration of Barnard to release over 50 students who had been suspended for violent disruptive protests at the first Columbia encampment.
- **The New School:** On April 20, 2024, NSJP joined in a call to action for the encampment at The New School that had taken over and disrupted function at the campus’s University Center, ordering its chapters and affiliates to provide the encampment with “supplies and numbers,” including “food, masks, water” and direct monetary contributions.¹⁸⁵ On April 21, 2024, NSJP joined in an emergency call to action for protestors to “show up now!” in defense of the encampment and a call for other allied protestors in the New York City area to join in defending the encampment.¹⁸⁶ On April 22, 2024, NSJP joined in a statement by its chapter at The

¹⁸³ American Muslims for Palestine: Connecticut Chapter (@ampalestine), Instagram, <https://www.instagram.com/p/C59rSIAsbIC/> (Apr. 19, 2024); American Muslims for Palestine: Connecticut Chapter (@ampalestine), Instagram, <https://www.instagram.com/p/C599p5zsz1x/> (Apr. 19, 2024); Sumud Coalition (@sumudyale), Instagram, https://www.instagram.com/p/C5-QuG0uTa5/?img_index=1 (Apr. 20, 2024).

¹⁸⁴ Sumud Coalition (@sumudyale), Instagram, https://www.instagram.com/p/C5_BU59ryPm/?img_index=3 (Apr. 20, 2024).

¹⁸⁵ New School Students for Justice in Palestine (@tns.sjp), Instagram, <https://www.instagram.com/p/C6B3Kh0u2kO/> (Apr. 21, 2024).

¹⁸⁶ New School Students for Justice in Palestine (@tns.sjp), Instagram, <https://www.instagram.com/p/C6CInemuz7g/> (Apr. 12, 2024); PYM NYC (@nycpym), Instagram, https://www.instagram.com/p/C6Ca2tUuYHM/?img_index=1 (Apr. 21, 2024).

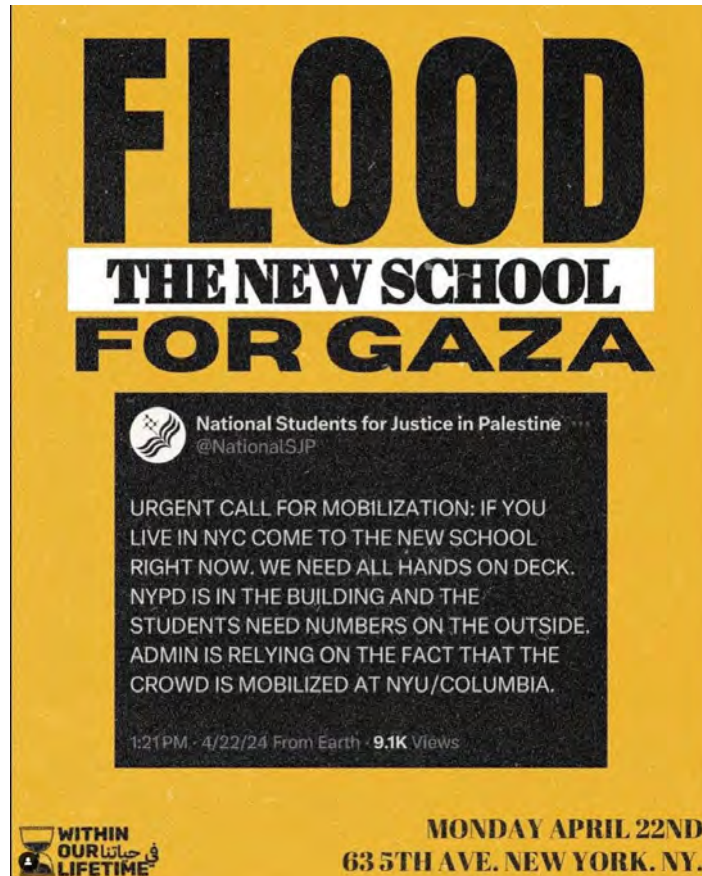
New School stating that it refused to move the location of its encampment within the University Center despite violating the fire code and school policy and endangering occupants of the building.¹⁸⁷ NSJP also joined its chapter in declaring its objection to the school administration calling in police and its intent to defy the police.¹⁸⁸ NSJP then issued a call for “mobilization” for all of its activists and protestors in New York City to come to The New School to defend its encampment against police. In this post, NSJP used Hamas-coded language calling on protestors to “Flood” The New School.¹⁸⁹ AMP, NSJP, and their pro-Hamas collaborators refer to many of their protest activities as “Floods” as a deliberate and proud reference to the October 7th attack, which Hamas codenamed “Operation Al-Aqsa Flood.”¹⁹⁰

¹⁸⁷ New School Students for Justice in Palestine (@tns.sjp), Instagram, <https://www.instagram.com/p/C6EjeGpOQrX/> (Apr. 22, 2024).

¹⁸⁸ New School Students for Justice in Palestine (@tns.sjp), Instagram, <https://www.instagram.com/p/C6EnzFiuvv-/> (Apr. 22, 2024).

¹⁸⁹ New School Students for Justice in Palestine (@tns.sjp), Instagram, <https://www.instagram.com/p/C6EtnbfuUXV/> (Apr. 22, 2024).

¹⁹⁰ See *supra* ¶ 65; *infra* ¶¶ 275, 278, 288, 309.



- **Vanderbilt:** On April 21, 2024, NSJP joined its Vanderbilt chapter in announcing that the chapter had established an encampment and had proudly occupied part of the campus for over 26 days.¹⁹¹ The message cited the encampments publicized by NSJP at Columbia, Yale, UNC, Rutgers, and elsewhere as the Vanderbilt chapter's inspiration. The announcement called for students and faculty to help occupy the encampment and support it with supplies.

¹⁹¹ Vanderbilt Divest Coalition (@vanderbiltdivestcoalition), Instagram, https://www.instagram.com/p/C6CT8rjOIpG/?img_index=10 (Apr. 21, 2024).

- **MIT:** On April 21, 2024, NSJP joined its affiliate at MIT in announcing that the affiliate had established an encampment on campus alongside the encampments launched at other Boston-area campuses and was calling on students to support it.¹⁹²
- **University of Michigan:** On April 22, 2024, NSJP joined its chapter at the University of Michigan in announcing that the chapter had created an encampment and was “joining the national call to occupy spaces on our college campuses and demand that our institutions end their complicity in the ongoing genocide in Palestine.”¹⁹³
- **New York University:** On April 22, 2024, NSJP joined its chapters at New York University in celebrating and promoting their encampment.¹⁹⁴ NSJP also directly called for its chapters and affiliates to “mobilize all day to defend the encampment” from law enforcement and school administrators.¹⁹⁵ This post used the phrase “Flood New York University for Gaza,” again using Hamas-coded “Flood” language to associate NSJP campus operations with the October 7th attack and terrorist violence against Jews and Israelis. NSJP publicized a post celebrating that NYU faculty had surrounded protesting students at the encampment to obstruct the police from arresting the students for violating the law.¹⁹⁶ NSJP joined in a subsequent post objecting to the arrest of encampment protestors for unlawfully occupying the campus, declaring, “we won’t back down, we won’t surrender.”¹⁹⁷ On April 24, 2024, NSJP joined in a post objecting

¹⁹² Vanderbilt Divest Coalition (@vanderbiltdivestcoalition), Instagram, https://www.instagram.com/p/C6C2kT3ObA5/?img_index=1 (Apr. 21, 2024).

¹⁹³ SAFE (@safemich), Instagram, https://www.instagram.com/p/C6EG-ZLgZTV/?img_index=1 (Apr. 22, 2024).

¹⁹⁴ NYU LSJP (@nyulsjp), Instagram, <https://www.instagram.com/p/C6EW69Iu-l3/> (Apr. 22, 2024).

¹⁹⁵ National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/p/C6EgMhvukmX/> (Apr. 22, 2024).

¹⁹⁶ PYM NYC (@nycpym), Instagram, <https://www.instagram.com/p/C6E7iKBu29C/> (Apr. 22, 2024).

¹⁹⁷ PYM NYC (@nycpym), Instagram, <https://www.instagram.com/p/C6FYssitu-z/> (Apr. 22, 2024).

to the arrest of encampment protestors after the protestors engaged in “disorderly, disruptive, and antagonizing behavior that interfered with the safety and security of [the NYU] community,” proudly stating that the protestors had staged a massive rally in support of the arrestees.¹⁹⁸

- **University of California Berkeley:** On April 22, 2024, NSJP joined its chapter at UC Berkeley in announcing the chapter’s encampment and declaring, “BERKELEY JOINS SCHOOL ACROSS THE NATION IN OCCUPYING THEIR CAMPUS UNTIL DIVESTMENT !! !!”¹⁹⁹ On April 23, 2024, AMP and NSJP posted a video of Hatem Bazian, AMP’s chairman and SJP’s founder, publicly speaking at the Berkeley encampment in support of its disruptive protests.²⁰⁰
- **University of Rochester:** On April 23, 2024, NSJP joined its chapter at the University of Rochester in announcing the chapter’s encampment and encouraging protestors to “protect the encampment” because “numbers matter; we protect each other.”²⁰¹
- **University of Minnesota:** On April 23, 2024, NSJP joined its chapter at the University of Minnesota in announcing that it had “joined other universities across the nation and set up an encampment on the mall in solidarity with the people of Gaza and Palestine and to demand divestment.”²⁰² NSJP then joined the chapter in objecting to law

¹⁹⁸ Writers Against the War on Gaza (@wawog_now), Instagram, <https://www.instagram.com/p/C6J4PZpu0td/> (Apr. 24, 2024).

¹⁹⁹ PYM Bay Area (@bayareapym), Instagram, <https://www.instagram.com/p/C6FBE7KSjRO/> (Apr. 22, 2024).

²⁰⁰ American Muslims for Palestine (@ampalestine), Instagram, https://www.instagram.com/p/C6HQjL_gL8K/ (Apr. 23, 2024).

²⁰¹ SJP UR (@sjp.ur), Instagram, https://www.instagram.com/p/C6GYU1yudFd/?img_index=7 (Apr. 23, 2024).

²⁰² Students for Justice in Palestine at the University of Minnesota (@sjpumn), Instagram, <https://www.instagram.com/p/C6GikZMuPZf/> (Apr. 23, 2024).

enforcement's arrest of protestors for trespassing and their intent to oppose law enforcement commands to end their unlawful assembly.²⁰³

- **Brown University:** On April 24, 2024, NSJP joined its chapter at Brown University in announcing the chapter's encampment and ordering students to "join the movement spreading across college campuses calling for university divestment from the genocide in Gaza," promising "No Rest Til Brown Divests."²⁰⁴
- **SoCal SJP:** On April 24, 2024, NSJP joined its regional chapter for campuses across Southern California—which AMP and NSJP had proudly brought into being and used to train and coordinate students in its chapters across the region in February 2024—in declaring, "We must take back control of our universities from the hands and interests of empire," and calling for students to "find an encampment, protest, walkout, or other mobilization happening near you and stand alongside encampments across the country in solidarity with Gaza!"²⁰⁵ The post condemned police arrest of NSJP student protestors for trespassing and violating the law at Pomona college. The post was signed by NSJP's 21 chapters comprising SoCal SJP.
- **University of Southern California (USC):** On April 24, 2024, NSJP joined a post by its chapter at USC announcing the chapter's encampment and calling for student support.²⁰⁶ NSJP then joined in posting a demand that the chapter's protestors at the

²⁰³ Students for Justice in Palestine at the University of Minnesota (@sjpumn), Instagram, https://www.instagram.com/p/C6Jn-o_L0za/?img_index=10 (Apr. 24, 2024).

²⁰⁴ Brown Divest Coalition (@browndivestcoalition), Instagram, https://www.instagram.com/p/C6JGomJuLQK/?img_index=1 (Apr. 24, 2024).

²⁰⁵ SoCal SJP (@socalsjp), Instagram, https://www.instagram.com/p/C6JZMoCr-wf/?img_index=1 (Apr. 24, 2024).

²⁰⁶ People's City Council (@peoplescitycouncil), Instagram, https://www.instagram.com/p/C6JZhsreBQ/?img_index=1 (Apr. 24, 2024).

encampment “need bodies now!” to defend it against shut down by USC.²⁰⁷ NSJP subsequently joined in a call for a mass protest action at the police station where students arrested for trespassing and other violations were being held to demand that the Los Angeles Police Department “release our comrades immediately.”²⁰⁸

- **University of Austin:** On April 24, 2024, NSJP joined its chapter at the University of Austin in objecting to the arrest of 50 of its protestors for trespassing and other violations and demanding their release. They called for mass obstruction and resistance against law enforcement: “We call on our community to resist the draconian tactics of intimidation employed by our university and to reaffirm our demands tomorrow” by interfering with classes, work, and university function.²⁰⁹ NSJP joined the chapter in another post that directly stated that the chapter’s law-violating encampment was created when its students “heeded the call for creating a popular university for Gaza on their campus,” and that the chapter was committed to continuing the encampment and its protests in violation of the law.²¹⁰
- **Emerson College:** On April 25, 2024, NSJP joined its chapter at Emerson College in calling for a mass mobilization at multiple police precincts where over 100 NSJP protestors were being held after their arrest for trespassing and violating the law.²¹¹

²⁰⁷ People’s City Council (@peoplescitycouncil), Instagram, <https://www.instagram.com/p/C6Jv16NJ0U0/> (Apr. 24, 2024).

²⁰⁸ PYM LA-OC-IE (@pymlaoie), Instagram, <https://www.instagram.com/p/C6Kzfr3rAQa/> (Apr. 24, 2024).

²⁰⁹ Palestine Solidarity Committee at University of Texas, Austin (@psc_atx), Instagram, https://www.instagram.com/p/C6KrpNSqOw/?img_index=1 (Apr. 24, 2024).

²¹⁰ Palestine Solidarity Committee at University of Texas, Austin (@psc_atx), Instagram, https://www.instagram.com/p/C6K9WGLtU3s/?img_index=9 (Apr. 25, 2024).

²¹¹ Boylston* SJP (@boylstonsjp), Instagram, <https://www.instagram.com/p/C6LP2vJO-AN/> (Apr. 25, 2024).

- DMV SJP:** On April 25, 2024, NSJP joined its regional chapter for the Washington, D.C. area in announcing the creation of a joint encampment in the George Washington University Yard as a collaboration between NSJP's chapters at George Washington University, George Mason University, American University, Georgetown, University of Maryland, UMBC, Howard, and Gallaudet.²¹² NSJP publicized another post by the regional chapter stating that the encampment was created to coerce universities into dropping charges against arrested or disciplined students who had violated the law and school policies in their disruptive protests.²¹³ NSJP then publicized an emergency post by the chapter calling for protestors to mobilize in defense of the encampment against shut down by George Washington University and the Metropolitan Police Department by rallying to resist and obstruct law enforcement.²¹⁴
- Ohio State University:** On April 25, 2024, NSJP joined in a post by its chapter at OSU announcing the creation of its encampment.²¹⁵ NSJP then joined in a post by its chapter calling for students to defend the encampment against law enforcement action by the school for violations of law and school policy, and publicized a post declaring that its protestors would not leave "despite threats of arrest."²¹⁶
- Cornell University:** On April 25, 2024, NSJP joined its chapter at Cornell in announcing the creation of its encampment as a "liberated zone" and calling for support

²¹² DMV SJP Coalition (@dmcsjp), Instagram, <https://www.instagram.com/p/C6LfxisuIQv/> (Apr. 25, 2024); DMV SJP Coalition (@dmcsjp), Instagram, <https://www.instagram.com/p/C6LorXBuYvI/> (Apr. 25, 2024).

²¹³ *Id.*

²¹⁴ PYM DMV (@dmvpym), Instagram, https://www.instagram.com/p/C6MHFVRubgt/?img_index=1 (Apr. 25, 2024).

²¹⁵ SJP OSU (@sjposu), Instagram, <https://www.instagram.com/p/C6LpO3xOKBZ/> (Apr. 25, 2024).

²¹⁶ SJP OSU (@sjposu), Instagram, <https://www.instagram.com/p/C6L4jtUO3Wv/> (Apr. 25, 2024); SJP OSU (@sjposu), Instagram, <https://www.instagram.com/p/C6NL5r2oqYb/> (Apr. 25, 2024).

through supplies, faculty holding classes in the encampment, student participation, and direct monetary contributions.²¹⁷

- **Northwestern University:** On April 25, 2024, NSJP joined in a post by its chapter at Northwestern University calling for a rally at its encampment to defend it against shut down by law enforcement.²¹⁸ On April 26, 2024, NSJP joined in a post by the chapter stating its intent to resist and obstruct law enforcement attempts to shut down the encampment and arrest students for trespassing and declaring its demand that administrators keep police away from the campus.²¹⁹
- **Fashion Institute of Technology (FIT):** On April 25, 2024, NSJP joined in a post by its chapter at FIT announcing that it was defying its ban from campus through the creation of an unlawful encampment—“WE WILL NOT LEAVE UNTIL OUR DEMANDS ARE MET!”—and that it was demanding disciplinary charges against disruptive protesting students be dropped.²²⁰
- **Princeton University:** On April 25, 2024, NSJP joined its Princeton chapter in publishing a press conference hosted by the chapter from within the encampment.
- **University of Pennsylvania (UPenn):** On April 25, 2024, NSJP joined its chapter at UPenn in announcing the creation of its encampment as a “liberated zone” “in solidarity with similar encampments taking place at universities nationwide, including Columbia

²¹⁷ The Coalition for Mutual Liberation at Cornell (@cmlcornell), Instagram, https://www.instagram.com/p/C6LqIFuNvy/?img_index=3 (Apr. 25, 2024).

²¹⁸ Northwestern University Divestment Coalition (@nudivestmentcoalition), Instagram, https://www.instagram.com/p/C6MUX0_uSdj/ (Apr. 25, 2024).

²¹⁹ Northwestern University Divestment Coalition (@nudivestmentcoalition), Instagram, https://www.instagram.com/p/C6NjGxBMDMu/?img_index=1 (Apr. 26, 2024).

²²⁰ The People’s Forum (@peoplesforumnyc), Instagram, https://www.instagram.com/p/C6MUnuDuw5-/?img_index=2 (Apr. 21, 2024).

University, Yale University, and New York University” for the purpose of advancing NSJP’s list of demands.²²¹

- **University of Connecticut (UConn):** On April 25, 2024, AMP and NSJP joined their chapters at UConn in calling for “back up” from other chapters to resist law enforcement attempts to shut down their encampment and arrest unlawful protestors.²²²
- **Purdue University:** On April 25, 2024, NSJP joined its chapter at Purdue in announcing the creation of the chapter’s encampment for the purpose of enforcing NSJP’s list demands as part of the Popular University for Gaza project.²²³
- **Harvard University:** On April 25, 2024, NSJP joined its Harvard chapter in celebrating the second night of its encampment.²²⁴
- **University of Illinois Urbana-Champaign:** On April 26, 2024, NSJP joined its chapter at the University of Illinois Urbana-Champaign in announcing the creation of the chapter’s encampment for the purpose of enforcing NSJP’s list of demands and seeking freedom from consequences against its disruptive and law-violating protestors.²²⁵

²²¹ (u)PAO (@up.against.the.occupation), Instagram, https://www.instagram.com/p/C6Msnw3pIpR/?img_index=1 (Apr. 25, 2024).

²²² American Muslims for Palestine: Connecticut Chapter (@ampalestinect), Instagram, https://www.instagram.com/p/C6Mxkrpvu_f/ (Apr. 25, 2024); American Muslims for Palestine: Connecticut Chapter (@ampalestinect), Instagram, <https://www.instagram.com/p/C6Mz0PAPWfP/> (Apr. 25, 2024).

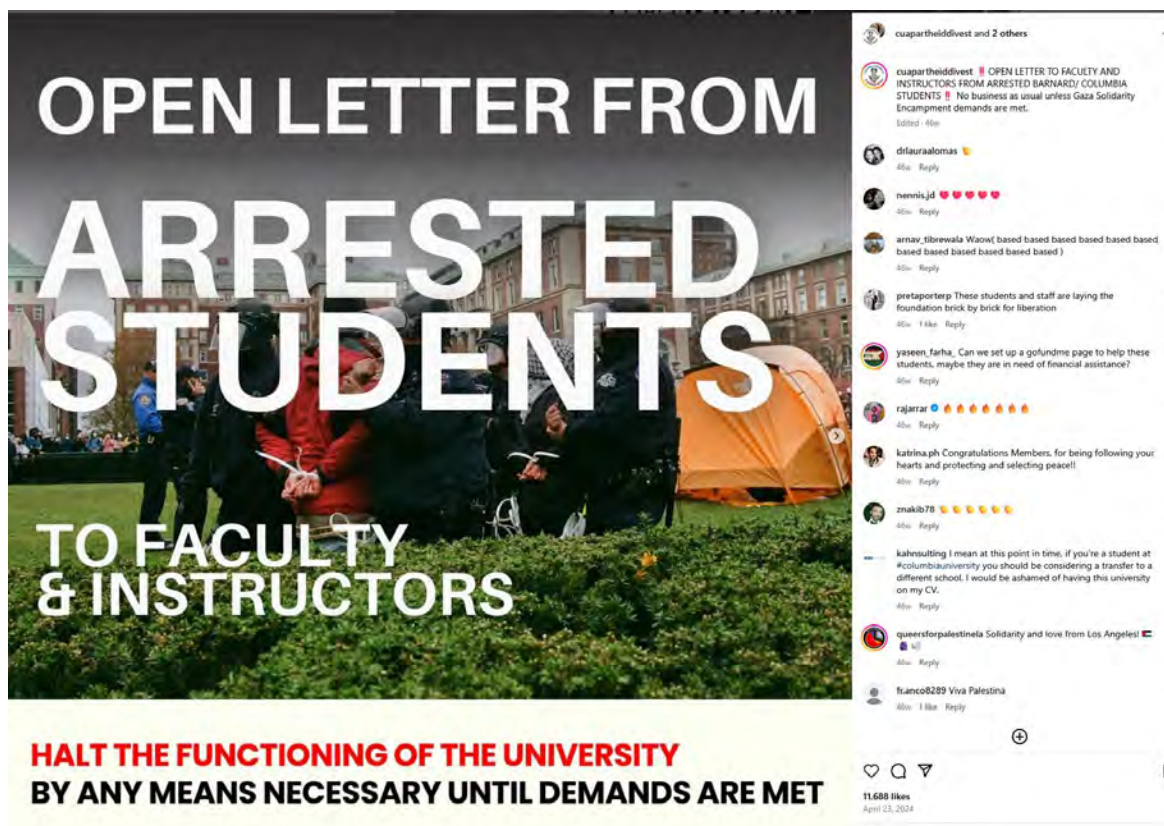
²²³ SJP Purdue (@sjppurdue), Instagram, https://www.instagram.com/p/C6NK5yWNz_N/?img_index=1 (Apr. 25, 2024).

²²⁴ Harvard Undergraduate Palestine Solidarity Committee (@harvardundergradpsc), Instagram, https://www.instagram.com/p/C6NZyQAM2bV/?img_index=1 (Apr. 25, 2024).

²²⁵ SJP UIUC (@sjp.uiuc), Instagram, https://www.instagram.com/p/C6OR9Mzruzrm/?img_index=4 (Apr. 26, 2024).

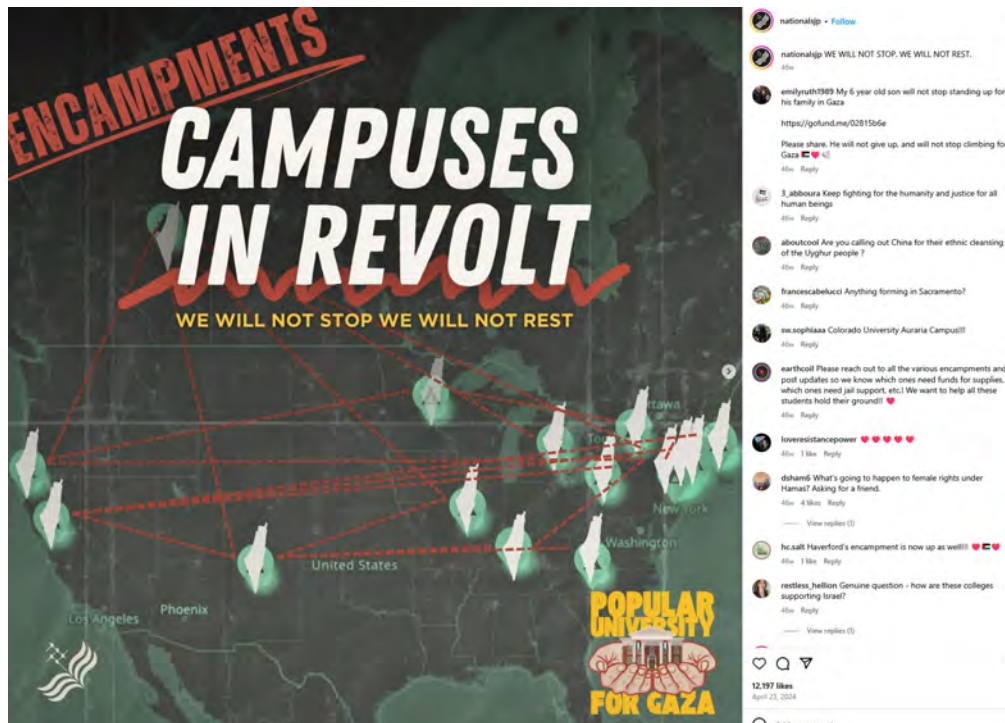
- **University of North Carolina (UNC):** On April 26, 2024, NSJP joined its chapter at UNC in announcing the creation of the chapter's encampment and calling on students to join it.²²⁶

186. On April 23, 2024, NSJP joined CUAD in publishing its “open letter from arrested students to faculty and instructors,” urging them “to halt the functioning of the university **by any means necessary** until Columbia grants full amnesty to students who participated in the Gaza Solidarity Encampment” and commits to Hamas’s goals of divesting from and boycotting Israel. The letter directly called for faculty and staff to violate their contracts, interfere with Columbia’s functioning, and engage in “calculated risk” to coerce the administration into compliance with CUAD’s (and NSJP’s) demands.



²²⁶ UNC SJP (@uncsjp), Instagram, https://www.instagram.com/p/C6Oi7TdOhaQ/?img_index=2 (Apr. 26, 2024).

187. NSJP then posted a map of its encampments on campuses across the United States and America, repeating its martial, violent rhetoric of referring to schools with its encampments as “campuses in revolt” and threatening, “WE WILL NOT STOP. WE WILL NOT REST.”²²⁷



188. On April 24, 2024, NSJP joined its chapters and affiliates at Columbia in declaring their protestors were willing to resist law enforcement attempts to disperse them, including by the National Guard.²²⁸

189. AMP and NSJP further demonstrated their direct support for and engagement with NSJP’s Columbia chapters and their encampment when AMP’s Executive Director, Osama Abuirshaid, came to the encampment on April 24, 2024.²²⁹ Abuirshaid made a fiery speech to the

²²⁷ National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/p/C6Hcbmyu0z3/?img_index=1 (Apr. 23, 2024).

²²⁸ Palestinian Youth Movement (@palestiniayouthmovement), Instagram, https://www.instagram.com/p/C6IVa34gHko/?img_index=4 (Apr. 24, 2024).

²²⁹ Will Carless and Romina Ruiz-Goiriena, *Amid campus protests, organizers with past ties to Hamas support also emerge*, USA Today (May 22, 2024), <https://www.usatoday.com/story/news/investigations/2024/05/22/gaza-student-protests-american-muslims-for-palestine/73775372007/>.

encampment protestors to galvanize them and encourage them in their violent, illegal activities and defend them with the false narrative that they were being persecuted for engaging in protected speech.²³⁰ Abuirshaid declared to the NSJP protestors that there was a “war” on them in America and against their First Amendment rights, and that police were repressing them.²³¹ Abuirshaid shouted that AMP and they were “going to continue to fight” until they achieved their goals regarding Hamas’s war against Israel.²³² Abuirshaid’s visit to NSJP’s Columbia chapters and affiliates and their encampment coincided with the creation of the encampment at CUNY the following day—which the Columbia chapters assisted with. The visit also demonstrated AMP and NSJP’s direct approval for the violence and antisemitism perpetrated by NSJP’s Columbia chapters and affiliates at their encampment.

190. The following day, on April 25, 2024, Abuirshaid visited the encampment at George Washington University created by NSJP’s DMV regional chapter.²³³ Abuirshaid gave a similar speech to the NSJP protestors at this encampment as he had at the Columbia encampment, directly encouraging and supporting their violent protests and calling for them to continue.

191. On April 25, 2024, NSJP again posted a declaration of its demands for the Popular University project. The pro-Hamas demands called for schools to divest from and boycott Israel and “defend” disruptive pro-Hamas activism on campuses by ceasing to discipline students whose protest actions violate law and school rules.²³⁴

²³⁰ American Muslims for Palestine, Facebook (April 25, 2024), <https://www.facebook.com/ampalestine/videos/1603828823790859/>.

²³¹ *Id.*

²³² *Id.*

²³³ *Executive Director Of 'American Muslims For Palestine' Osama Abuirshaid At George Washington University Encampment: We Will Take Back America, Just Like We Will Take Back Palestine; You Will Be The Past, We Will Be The Future*, MEMRI (Apr. 25, 2024), <https://www.memri.org/tv/executive-director-american-muslims-palestine-osama-abuirshaid-george-washington-university-encampment-change-america-zionism-removed>.

²³⁴ National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/p/C6Mes8bOYZ1/?img_index=4 (Apr. 25, 2024).

192. NSJP also issued an official statement condemning the Atlanta Police Department for arresting protestors at the Emory University encampment.²³⁵ The student and faculty protestors arrested at Emory were arrested for a litany of crimes, including criminal trespassing, disorderly conduct, obstructing law enforcement officers, and battery.²³⁶ The “Stop Cop City” movement that AMP, NSJP, and NSJP’s Emory chapter had allied themselves with and were supporting is a violent anti-police domestic terrorism movement that was waging a campaign of destruction to prevent a new law enforcement training facility from being constructed near Atlanta, Georgia.²³⁷ This movement was responsible for at least 23 acts of arson destroying over 81 pieces of property, including construction equipment and police vehicles, had attempted to assassinate police officers, and had inflicted over \$6 million in additional security costs to protect companies and people associated with the project threatened by the movement.²³⁸ In January 2023, a member of the “Stop Cop City” movement shot a police officer who was clearing one of its encampments in the abdomen.²³⁹ The shooter was killed when police returned fire in self-defense.²⁴⁰

193. On April 26, 2024, NSJP issued a militant message celebrating its chapters and affiliates’ use of violent physical force in resisting and fighting the police in “defense” of their illegal encampments, stoking their fear and paranoia that law enforcement and universities were

²³⁵ National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/p/C6M9PPcMUTO/> (Apr. 25, 2024).

²³⁶ Michael Duke, *Meet the Emory University students and faculty arrested at Hamas-endorsed protest*, Campus Reform (June 27, 2024), <https://www.campusreform.org/article/meet-emory-university-students-faculty-arrested-hamas-endorsed-protest/25764>.

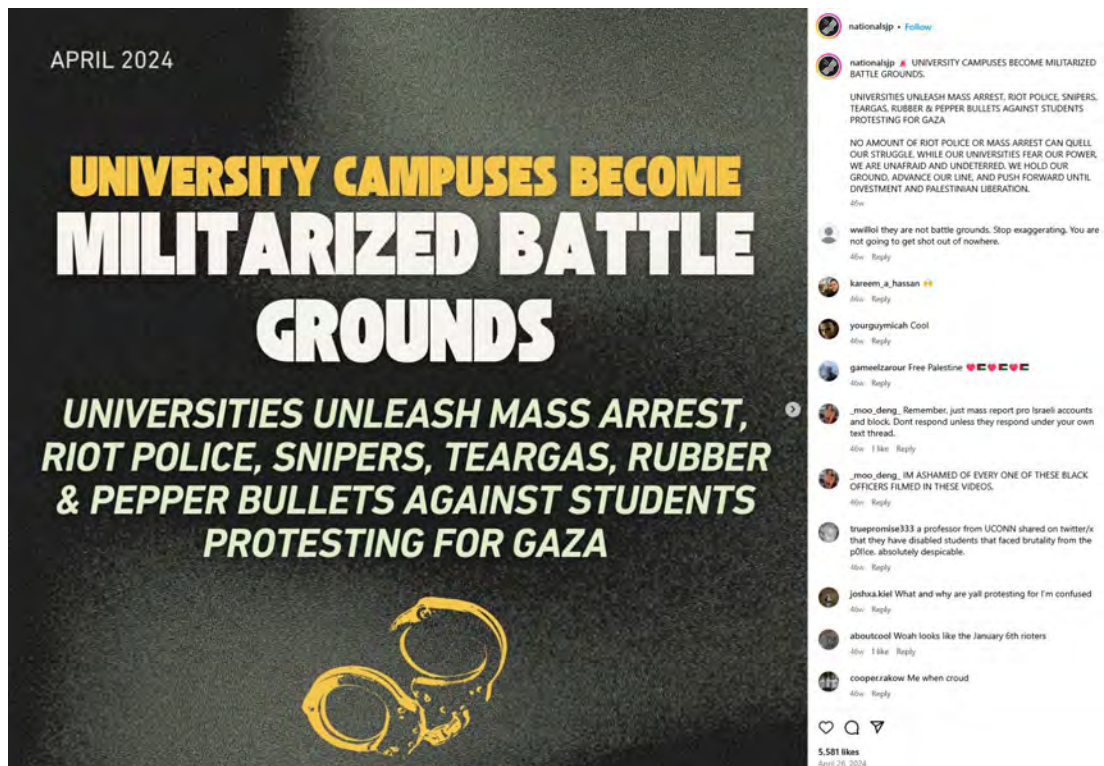
²³⁷ R.J. Rico, *‘Stop Cop City’ attacks have caused costs to balloon for Atlanta police training center, officials say*, PBS News (Jan. 18, 2024), <https://www.pbs.org/newshour/politics/stop-cop-city-attacks-have-caused-costs-to-balloon-for-atlanta-police-training-center-officials-say>.

²³⁸ *Id.*

²³⁹ R.J. Rico, *Man killed, trooper shot while ‘Cop City’ protesters cleared*, Associated Press (Jan. 18, 2023), <https://apnews.com/article/georgia-atlanta-5a101c06c8a3e6faf970b125e627fcb7>.

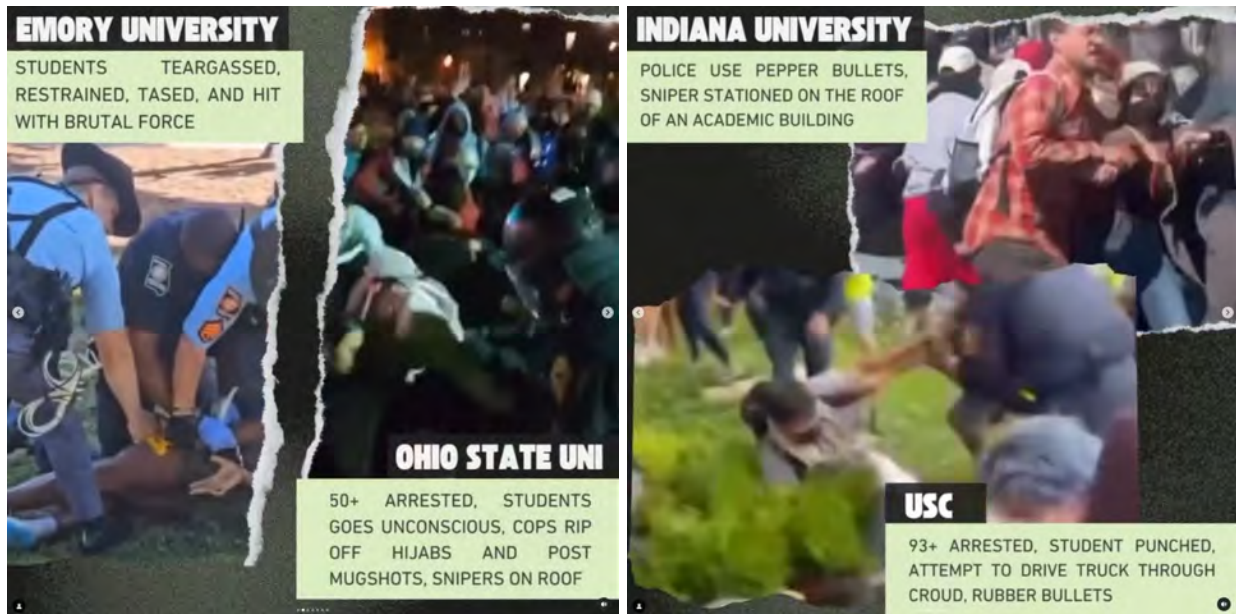
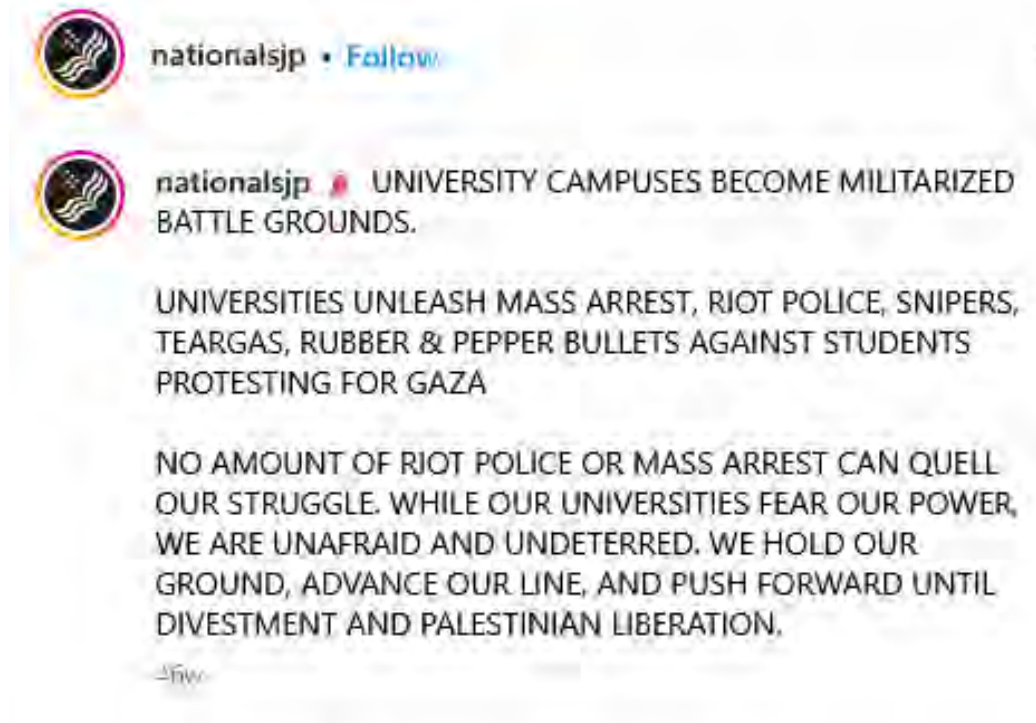
²⁴⁰ *Id.*

a danger to them that must be fought.²⁴¹ The post included multiple video clips of NSJP protestors at various schools fighting with police, including a video of protestors at Cal Poly Humboldt repeatedly striking police officers in the head, which NSJP defended, lauded, and directed its chapters and affiliates to emulate:



²⁴¹ National Students for Justice in Palestine https://www.instagram.com/p/C6POTL5uN5E/?img_index=1 (Apr. 26, 2024).

(@nationalsjp), Instagram,





194. On April 27, 2024, NSJP issued a statement referring to the encampments created by its chapters and affiliates for its Popular University project as the “Student Intifada” and stating, “LONG LIVE THE STUDENT INTIFADA”—directly comparing its Popular University project

to Hamas's violent terrorism campaigns against Israel in which thousands of Israeli and Jewish civilians were killed and wounded by Hamas terrorists:²⁴²



195. On April 28, 2024, NSJP published an updated map celebrating the expansion of its Popular University project to even more campuses, again militantly referring to them as “campuses in revolt” and promising to take over even more campuses.²⁴³ Reflecting the significant planning, coordination, and resource investment AMP and NSJP were putting into this campaign to take over campuses, disrupt school function, and violently resist police attempts to enforce the law, NSJP boasted that it had organized “over 100+ protests, occupations, popular universities & encampments in 1 week.” Included in the post were images celebrating NSJP’s encampments at OSU, UT Dallas, Purdue, Harvard, Northeastern, Swarthmore, Brown University, the George

²⁴² National Students for Justice in Palestine (https://www.instagram.com/p/C6SAhU9u9S8/?img_index=1) (Apr. 27, 2024).

²⁴³ National Students for Justice in Palestine (https://www.instagram.com/p/C6UNvfKu6O7/?img_index=1) (Apr. 28, 2024).

(@nationalsjp), Instagram,

(@nationalsjp), Instagram,

Washington Yard, University of Houston, Rice University, Pitzer College, Penn State, Northwestern, FIT, CUNY, SUNY, UPenn, UNC Charlotte, UCLA, and USC.



196. NSJP then issued a call to action for faculty and staff to join its Popular University project to support its chapters and affiliates and “do [their] part to halt the function of the university as normal, and to defend Gaza.”²⁴⁴ The post directly celebrated the CUNY encampment and a mob of faculty who physically interfered with law enforcement’s ability to enter the encampment and then joined in attacking and driving off the officers,²⁴⁵ as well as a professor from Northwestern who physically obstructed and interfered with law enforcement officers’ attempts to arrest lawbreaking students.

D. Antisemitism, harassment, and violence against innocent bystanders were systemic at the NSJP encampments.

197. NSJP’s chapters and affiliates consistently perpetrated mass actions of antisemitic and anti-Israeli harassment, discrimination, and violence at their encampments, and violence against bystanders. As reflected in AMP and NSJP’s mission statements for the Popular University project, this violence was part and parcel of AMP and NSJP’s plan for the encampments to seize and dominate campuses and disrupt school operations in service of Hamas.²⁴⁶

198. The model encampment that AMP and NSJP created and supported at Columbia in collaboration with NSJP’s CUNY and Columbia chapters and affiliates was among the most violent and aggressive, becoming infamous for the antisemitic and anti-Israel discrimination and violence it inflicted on campus.

199. As reported by Columbia’s task force on antisemitism, the encampment at Columbia made the violence and intimidation being perpetrated against Jews by NSJP’s chapters

²⁴⁴ National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/p/C6UWGILuxXd/?img_index=2 (Apr. 28, 2024).

²⁴⁵ See *infra* ¶ 219.

²⁴⁶ See *supra* ¶ 182.

and affiliates even worse.²⁴⁷ Jewish students began to be threatened and attacked in greater numbers. NSJP’s chapters and affiliates regularly hosted “vigils” praising Hamas in the encampment. Chants at the encampment and its “vigils” included, “Yes Hamas, we love you, we support your rockets too,” and “We say justice you say how: burn Tel Aviv to the ground.”²⁴⁸ One student reported seeing a student hold a sign reading “Al-Qassam Brigade’s next target” that was positioned so that it referred to a Jewish student peacefully singing the Israeli national anthem.²⁴⁹ The “Glory to Our Martyrs” name itself reflects the vigils’ pro-Hamas nature—Hamas and organizations supporting it refer to terrorist operatives as “martyrs.” An Arab-Israeli journalist who came to Columbia’s campus during the encampment to speak against Hamas was encircled by encampment protestors who called him antisemitic slurs, yelled for him to kill himself—“put a bullet in your head;” “kill yourself!”—shoved him, and then punched him in the face.²⁵⁰ Protestors at the encampment shouted, “Jew-lover” and “Zionist” at Columbia’s custodial staff who attempted to clean messes at the encampment.²⁵¹ One Columbia custodian—later attacked by members of NSJP’s chapters and affiliates during their riot at Columbia on April 30, 2024—feared for his safety just walking past the encampment on his way to work.²⁵² AMP and NSJP directly condoned and valorized this violence and bigotry, as demonstrated by AMP’s Executive Director

²⁴⁷ *Columbia University Student Experiences of Antisemitism and Recommendations for Promoting Shared Values and Inclusion: Report #2*, Task Force on Antisemitism 25 (August 2024) (available here: <https://president.columbia.edu/sites/default/files/content/Announcements/Report-2-Task-Force-on-Antisemitism.pdf>).

²⁴⁸ *Id.*

²⁴⁹ *Id.*

²⁵⁰ Nikolas Lanum and Kristine Parks, *Arab-Israeli journalist speaks out after being attacked by anti-Israel agitator at Columbia University*, Fox News (Apr. 23, 2024), <https://www.foxnews.com/media/arab-israeli-journalist-speaks-attacked-anti-israel-agitator-columbia-university>

²⁵¹ Ryan King, *Columbia janitors claim they were illegally forced to scrub swastikas then were attacked, trapped by anti-Israel mob as civil rights probe launched*, New York Post (Mar. 17, 2025), <https://nypost.com/2025/03/17/us-news/civil-rights-enforcement-agency-opens-probe-into-columbia-university-over-janitors-trapped-and-attacked-by-anti-israel-mob/>.

²⁵² *Id.*

honoring the encampment with a personal visit in which he praised the protestors' conduct and called on them to continue it.²⁵³

200. NSJP's chapters and affiliates at UCLA used their encampment to create "checkpoints" to enforce a "Jew exclusion zone," using force to physically bar students from moving around public spaces on campus.²⁵⁴ Protestors at the encampment attacked a Jewish woman with a club.²⁵⁵

201. AMP and NSJP never condemned, disapproved of, or otherwise addressed these or any other instances of discrimination, harassment, and violence against innocent bystanders by NSJP's chapters and affiliates occupying and "defending" their encampments under AMP and NSJP's orders. Just as before with the earlier violent and antisemitic protests immediately following the October 7th attack, AMP and NSJP continued to collaborate with, support, praise, and come to the defense of NSJP's chapters and affiliates, repeatedly holding NSJP's most violent and hateful chapters and affiliates up as examples to all the others.

VII. NSJP's CUNY and Columbia chapters and affiliates collaborated in establishing the encampments at both CUNY and Columbia.

A. NSJP's CUNY chapters and affiliates helped create, support, and defend the first Columbia encampment.

202. With the start of NSJP's Popular University project and its work to proliferate encampments on campuses, NSJP's chapters and affiliates at CUNY and Columbia continued working together directly, extending beyond the mutual defense and support network that CUNY for Palestine created with NSJP to direct collaboration on organizing, supplying, and maintaining

²⁵³ See *supra* ¶ 189.

²⁵⁴ Evan Gahr, *House Committee Blasted UCLA for Ceding to Pro-Hamas Mobs*, California Globe (Nov. 21, 2024), <https://californiaglobe.com/fr/house-committee-blasted-ucla-for-ceding-to-pro-hamas-mobs/>

²⁵⁵ *Id.*

unlawful encampments on their respective campuses and defending them against law enforcement shut down with physical force.

203. In addition to CUNY for Palestine joining NSJP in its call on April 17, 2024, to directly support the Columbia encampment and physically obstruct law enforcement,²⁵⁶ CUNY for Palestine and its fellow NSJP chapters and affiliates at CUNY were directly involved in the physical maintenance, support, and defense of the Columbia encampment.

204. On April 18, 2024, four of NSJP's CUNY chapters and affiliates—CUNY for Palestine, CUNY Graduate Center 4 Palestine, CCNY SJP, and CUNY Jewish Antizionist Collective—declared an “emergency rally from City College to Columbia” to defend the Columbia encampment.²⁵⁷

205. CUNY for Palestine and CUNY Graduate Center for Palestine then posted videos of their members marching and rallying at Columbia in support of its encampment.²⁵⁸

206. They then joined with the other NSJP chapters and affiliates at CUNY and NSJP's other pro-Hamas collaborators in organizing an “emergency demonstration” on April 19, 2024, in support of the Columbia encampment²⁵⁹ and collaborating with CUAD in celebrating and promoting the encampment, demanding no legal or disciplinary consequences for students engaged in unlawful protests and disruptive conduct,²⁶⁰ and directing members of NSJP's chapters

²⁵⁶ *Supra* ¶ 161.

²⁵⁷ CUNY for Palestine (@cuny4palestine), Instagram, <https://www.instagram.com/p/C56GGMSO1yq/?hl=en> (Apr. 18, 2024).

²⁵⁸ CUNY for Palestine (@cuny4palestine), Instagram, https://www.instagram.com/p/C563ntNO8jt/?hl=en&img_index=1 (Apr. 18, 2024); CUNY Graduate Center for Palestine (@cunyg4pal), Instagram, <https://www.instagram.com/p/C57V5PpNm1d/?hl=en> (Apr. 18, 2024).

²⁵⁹ The People's Forum (@peoplesforumnyc), Instagram, <https://www.instagram.com/p/C58SoaHAoDO/?hl=en> (Apr. 19, 2024).

²⁶⁰ CUNY for Palestine (@cuny4palestine), Instagram, <https://www.instagram.com/p/C58a6-vORc/?hl=en> (Apr. 19, 2024); PYM NYC (@nycpym), Instagram, <https://www.instagram.com/p/C58hVv1O46X/?hl=en> (Apr. 19, 2024).

and affiliates at CUNY to reinforce the encampment at Columbia in resistance against law enforcement.²⁶¹

207. On April 20, 2024, CUNY for Palestine joined NSJP’s pro-Hamas collaborators in organizing a rally in support of NSJP’s encampment at Columbia.²⁶² CUNY for Palestine then published a post directing its members and supporters to spend their spring break vacation unlawfully occupying Columbia in support of its encampment, specifically contemplating conflict with law enforcement, and advertised that NSJP’s chapters and affiliates at Columbia and CUNY were already planning to create an encampment at CUNY—“Columbia first! CUNY next! All universities must divest!”²⁶³

²⁶¹ CUNY for Palestine (@cuny4palestine), Instagram, <https://www.instagram.com/p/C58i5wKubPL/?hl=en> (Apr. 19, 2024).

²⁶² The People’s Forum (@peoplesforumnyc), Instagram, <https://www.instagram.com/p/C5-0zU2A-gm/?hl=en> (Apr. 20, 2024).

²⁶³ CUNY for Palestine (@cuny4palestine), Instagram, https://www.instagram.com/p/C6AD7IaOsjh/?hl=en&img_index=1 (Apr. 20, 2024).



208. On April 21, 2024, CUNY for Palestine participated in filming and publishing a video of Nerdeen Kiswani, the leader of AMP and NSJP's ally/subdivision Within Our Lifetime,

speaking about the Columbia encampment's role in creating a domino effect enabling the creation of encampments across the country.²⁶⁴ Kiswani's speech reflected AMP and NSJP's strategy of using NSJP's chapters and affiliates at Columbia and CUNY to create an encampment at Columbia as a spearhead for their Popular University project.

209. On April 22, 2024, CUNY for Palestine and CUNY Graduate Center 4 Palestine issued a call for a full academic boycott of Columbia and Barnard until those schools reinstated students suspended for unlawful and rules-violating conduct in connection with NSJP protests.²⁶⁵ NSJP's CUNY chapters used NSJP's tactic of supporting and giving cover to unlawful, violent conduct by NSJP protestors by fabricating false propaganda narratives that the protestors were only engaged in "peaceful protest" and "protected speech" in order to pressure law enforcement and school authorities into dropping charges or discipline against the offending protestors.

210. On April 22, 2024, CUNY for Palestine published a video report by one of its members who is a journalist with the publication Left Voice. The reporter stated that the encampment created by NSJP's chapters and affiliates at Columbia had paved the way for the encampments by NSJP's chapters and affiliates at other schools and that it was imperative that students and protestors mobilize to support and defend the encampments.²⁶⁶

211. On April 23, 2024, CUNY for Palestine and another NSJP chapter at CUNY published an "URGENT ACTION CALL" demanding that students, faculty, and staff join with

²⁶⁴ CUNY for Palestine (@cuny4palestine), Instagram, <https://www.instagram.com/p/C6CDPGCuuib/?hl=en> (Apr. 21, 2024).

²⁶⁵ CUNY for Palestine (@cuny4palestine), Instagram, https://www.instagram.com/p/C6EhoUJu5RJ/?hl=en&img_index=1 (Apr. 22, 2024).

²⁶⁶ Left Voice (@left_voice), Instagram, <https://www.instagram.com/p/C6Fnqn3Ow2-/?hl=en> (Apr. 22, 2024).

local protestors to protest against a rumored law enforcement shut down of the Columbia encampment.²⁶⁷

B. NSJP’s CUNY chapters and affiliates set up their own encampment as part of AMP and NSJP’s Popular University project.

212. On April 25, 2024, over 200 members of NSJP’s chapters and affiliates at CUNY gathered to set up an encampment in a public square at CUNY’s campus at the City College of New York (“CCNY”).²⁶⁸ The protestors established the encampment by erecting tents and putting up banners and placards reflecting NSJP’s demands and slogans related to harming Israel in service of Hamas’s goals, including the following: “No More Investment in Apartheid;” “Teachers for Palestine Liberation;” “No Business as usual Until CUNY Divests;”²⁶⁹ “From the River to the Sea, Palestine is almost free;” and “We Want ’48.”

²⁶⁷ Brooklyn College SJP (@bc_sjp), Instagram, https://www.instagram.com/p/C6IM7Csstv8/?hl=en&img_index=1 (Apr. 23, 2024).

²⁶⁸ Tatiana Cozzarelli, *CUNY Joins Universities Around the County, Sets up Gaza Solidarity Encampment*, Left Voice (Apr. 25, 2024), <https://www.leftvoice.org/cuny-joins-universities-around-the-county-sets-up-gaza-solidarity-encampment/>.

²⁶⁹ *Id.*



213. The NSJP protestors also defaced the base of the flagpole in the center of the square with statements and symbols that, like CUAD, reflected their support for Hamas, including “Long Live the Resistance” accompanied by an upside-down triangle symbol, a direct reference to Hamas’s use of the same symbol in its propaganda videos to designate targets for its terror

attacks—the symbol has been used since October 7th by Hamas supporters worldwide as an antisemitic symbol to identify Jewish homes and institutions for discrimination, harassment, and attack, and to otherwise intimidate Jews.²⁷⁰

214. NSJP’s chapters and affiliates creating the encampment at CUNY pushed NSJP’s list of demands—divesting from and boycotting Israel, banning law enforcement and Israelis from CUNY campuses, freeing NSJP protestors and affiliates from legal and disciplinary consequences—and additional demands for free tuition and a “fair contract” for staff and faculty:

- 1) Divest! Immediately divest from ALL companies complicit in the imperialist-zionist genocide, including weapons, tech and surveillance, and construction companies. Commit to full financial transparency regarding CUNY’s institutional investments.
- 2) Boycott! Ban all academic trips to the Zionist state, encompassing birthright, Fulbright, and perspective trips. Cancel all forms of cooperation with Israeli academic institutions, including events, activities, agreements, and research collaborations.
- 3) Solidarity! Release a statement affirming the right of the Palestinian people to national liberation and the right of return. Protect CUNY students and workers who are attacked for speaking out against the genocide in Gaza and in solidarity with Palestinian liberation. Reinstate professors who have been fired for showing solidarity with Palestine.
- 4) Demilitarize! Demilitarize CUNY, Demilitarize Harlem! Get IOF and NYPD officers off all CUNY campuses, and end all collaboration, trainings and recruitment by imperialist institutions, including the CIA, Homeland Security and ROTC. Remove all symbols of US imperialism from our campuses: Rename the Colin Powell School of Global and Civic Leadership at CCNY and reinstate The Guillermo Morales and Assata Shakur Community and Student Center!

²⁷⁰ See Center on Extremism, *Campus Antisemitism Surges Amid Encampments and Related Protests at Columbia and Other U.S. Colleges*, ADL (Apr. 22, 2024), <https://www.adl.org/resources/blog/campus-antisemitism-surges-amid-encampments-and-related-protests-columbia-and-other>; *Inverted Red Triangle*, ADL Glossary of Extremism and Hate (accessed Sep. 3, 2023), <https://extremismterms.adl.org/glossary/inverted-red-triangle>.

- 5) A People's CUNY! We demand a fully-funded, free CUNY that is not beholden to Zionist and imperialist private donors! Restore CUNY's tuition-free status, protect the union and adopt a fair contract for staff and faculty.²⁷¹

215. On information and belief, based on the proximity between the encampments at CCNY and Columbia, the close coordination between NSJP's CUNY and Columbia chapters in establishing, supporting, and defending the Columbia encampment, the organizational similarities between the encampments—including both having an apparent central external source of tents and supplies—the open collaboration that later occurred between rioters from both encampments in attacking the CCNY campus on April 30, 2024, NSJP's support, encouragement, and assistance with the riot, the close working relationship between CUNY for Palestine and CUAD and NSJP, AMP Executive Director Osama r's visit to the Columbia encampment the day before the CUNY encampment's creation, and the close involvement of AMP and NSJP's pro-Hamas collaborators in providing support, assistance, and reinforcements to the CUNY encampment, the CUNY encampment was created, maintained, and run with direct involvement from NSJP and its Columbia chapters and affiliates.

216. On April 25, 2024, CUNY for Palestine and the NSJP chapter at CUNY's Queens College joined in announcing the creation of the encampment and called for protestors to "RUSH TO CITY COLLEGE TO CAMP AT CCNY!!!!".²⁷² CUNY for Palestine and the NSJP chapter at CCNY posted a video of the encampment, declaring that "CUNY students all across NYC" had launched the CUNY encampment and called for protestors to come support it.²⁷³

²⁷¹ Cozzarelli, *supra* note 268.

²⁷² Students Together Against Institutional Racism (@studentstogetherair), Instagram, <https://www.instagram.com/p/C6L71Tcupnw/?hl=en> (Apr. 25, 2024).

²⁷³ PAL-Awda NY (@palawda), Instagram, <https://www.instagram.com/p/C6L9CyBumgT/?hl=en> (Apr. 25, 2024).

217. CUNY for Palestine joined with NSJP's pro-Hamas collaborator New York City Palestinian Youth Movement in posting a video of NSJP members at the CUNY encampment raising the Palestinian flag on the flagpole in the center of the square on CCNY's campus they had taken over.²⁷⁴

218. CUNY for Palestine then joined with the Queens College SJP, New York City Palestinian Youth Movement, and two other NSJP collaborators in declaring the CUNY encampment's demands on CUNY.²⁷⁵

219. In the afternoon of April 25, 2024, after the CUNY encampment was established, a handful of CUNY public safety officers went to the encampment. Protestors from NSJP's chapters and affiliates blocked the public safety officers' entry, with assistance from allied CUNY faculty.

220. CUNY for Palestine and CCNY SJP then joined with a local pro-Hamas organization, the Palestinian Assembly for Liberation, in issuing an urgent call for protestors to "COME TO THE CCNY CAMPUS NOW TO PROTECT THESE STUDENT AT THE GAZA SOLIDARITY ENCAMPMENT NOW" from the public safety officers.²⁷⁶

221. CUNY for Palestine also joined with NSJP's other frequent pro-Hamas collaborators—the New York City Palestinian Youth Movement, Answer Coalition, and The People's Forum—in issuing a demand for protestors to come to the CUNY encampment to physically resist law enforcement.²⁷⁷ The demand was made under the "Shut It Down! For

²⁷⁴ PYM NYC (@nycpym), Instagram, https://www.instagram.com/p/C6MAuYsOdJQ/?hl=en&img_index=1 (Apr. 25, 2024).

²⁷⁵ Students Together Against Institutional Racism (@studentstogetherair), Instagram, <https://www.instagram.com/p/C6MEDitOsn0/?hl=en> (Apr. 25, 2024).

²⁷⁶ PAL-Awda NY (@palawda), Instagram, <https://www.instagram.com/p/C6Mcj4aunNz/?hl=en> (Apr. 25, 2024).

²⁷⁷ PYM NYC (@nycpym), Instagram, <https://www.instagram.com/nycpym/p/C6MjkdWOeqX/?hl=en> (Apr. 25, 2024).

Palestine” branding that NSJP created and utilized with these collaborators in organizing hundreds of national events weekly over previous months.

222. CUNY for Palestine then joined with other NSJP affiliates and pro-Hamas collaborators—including Dissenters—in issuing another “URGENT” call to action to come defend the CUNY encampment and pressure CUNY’s chancellor to desist from law enforcement action against the protestors.²⁷⁸

223. The NSJP chapters and affiliates at the CUNY encampment then swarmed the public safety officers and violently repulsed them, shoving them back and pelting them with objects.²⁷⁹ As the mob of NSJP chapter members and supporters shoved and attacked the public safety officers, it chanted “we will stay, we will stay, we will stay.”²⁸⁰

224. After the NSJP chapters and affiliates and allied faculty successfully fought off the CUNY public safety officers, CUNY for Palestine boasted of “chas[ing] the public safety out after some scuffles” and ensuring “no arrests were made” and that “hundreds of students” and faculty were “preparing for another raid, potentially involving a large police presence.”²⁸¹

²⁷⁸ NYC Dissenters (nycdissenters), Instagram, <https://www.instagram.com/p/C6MrG0gufKe/?hl=en> (Apr. 25, 2025).

²⁷⁹ Olivia Land, *Anti-Israel protesters who set up ‘intifada’ tent camp at state-funded NYC college seen pushing school security in dramatic video*, New York Post (Apr. 25, 2024), <https://nypost.com/2024/04/25/us-news/anti-israel-protesters-set-up-city-college-encampment/>.

²⁸⁰ *Id.*

²⁸¹ The Independent (@theindependent), Instagram, https://www.instagram.com/p/C6M6JmHOarK/?hl=en&img_index=1 (Apr. 25, 2024).



225. On April 26, 2024, CUNY for Palestine posted a message of triumph from the CUNY encampment at having successfully “made it through our first night as CUNY Gaza Solidarity Camp at the City College of New York” after resisting and fighting off CUNY’s public safety officers, stating “WE WILL NOT STOP WE WILL NOT REST”²⁸²

²⁸² CUNY for Palestine (@cuny4palestine), Instagram, <https://www.instagram.com/p/C6O0vHsO3JU/?hl=en> (Apr. 26, 2024).



VIII. Protestors from NSJP’s encampment at CUNY attacked Plaintiff Horowitz for carrying an American flag.

226. In the late afternoon on April 26, 2024, Plaintiff Horowitz entered CCNY’s campus to film a video. He had learned about the encampment at CCNY on social media as one of many such encampments set up at schools in New York City where he lives. Though he did not learn anything about the CUNY encampment in particular, he wanted to visit it and see how the protestors there would react to him waving the American flag since CCNY is a publicly funded school. He did not know about the NSJP protestors’ attack on CUNY’s security personnel the day before and did not think going to the encampment would be dangerous because there were police and public safety officers present.

227. Horowitz had a camera set up to film him as he approached the vicinity of the encampment with the flag. As Horowitz neared the encampment, and before he had even waved the flag, he was rapidly surrounded by a mob of protestors from the NSJP encampment.

228. After swarming from the encampment to surround Horowitz, the mob immediately ripped the American flag from Horowitz hands, smashed it on the ground, and began beating him. The attack occurred during the middle of the day, in broad daylight, in full view of the surrounding campus, the encampment, and hundreds of onlookers.

229. The mob's violence was calculated to commit grievous harm: the mob's members kicked, punched, and headbutted Horowitz, aiming strikes at his throat, spleen, and kidney—areas of the body that are particularly vulnerable to harm.

230. While beating Horowitz, the mob dragged him to the ground and shoved him down nearby stairs. After being shoved down the stairs, Horowitz got up and ran back to retrieve his flag, refusing to allow the mob to desecrate it. As Horowitz went for the flag, the mob grabbed him again and continued beating him. The mob then pushed Horowitz off the ledge of a nearby retaining wall. Horowitz got up and ran back to the flag again. Again, he was grabbed, punched, kicked, and headbutted by the mob.

231. Only during the mob's third round of attacks on Horowitz did officers from CUNY's campus police and the NYPD arrive.

232. The attack ended when the police arrived, but the police only detained Horowitz; they let all of his attackers go free. The police treated Horowitz aggressively, bodily removing him from the scene in a tight armlock and telling him they did not care about the attack on him. They told him that his attackers had a "right" to be on the campus, that he had no such right, and that they would arrest him if he came back to the campus.

233. That evening, the NSJP chapters and affiliates who had attacked Horowitz at the CUNY encampment arranged for a live call with incarcerated murderer and domestic terrorist Mumia Abu-Jamal.²⁸³ Abu-Jamal was a founding member of the Philadelphia chapter of the Black Panther party and was convicted of murdering police officer Daniel Faulkner. Abu-Jamal congratulated the NSJP members who had violently occupied the CUNY encampment and encouraged them to escalate their operations:

I am speaking to you from the American system of mass incarceration, but what we're involved in right now is something called mass education. City College, Columbia, Emory, and USC are all part of that process right now. ... You're part of something magnificent, soul-changing, mind-changing, history changing. Do not let go of this moment. Make it bigger. Make it more massive. Make it more powerful. Make it echo up into the stars. I am thrilled by your work. I love you. I admire you. On the move!²⁸⁴

234. As a result of the mob's attack, Horowitz suffered bruises and wounds, primarily to his torso, and had to go to an urgent care facility for examination. Horowitz also had to attend physical therapy for his arm and shoulder which were injured during the attack, which continues to this day.

235. The protestors associated with NSJP and its chapters and affiliates who attacked Horowitz in "defense" of the encampment were encouraged, guided, trained, supported, and directed in doing so by AMP and NSJP as part of their operation to have NSJP's chapters and affiliates perpetrate violent takeovers of campuses in support of Hamas: the encampment at CCNY was created by NSJP's CUNY and Columbia chapters; they created it acting on AMP and NSJP's orders and using resources, training, guidance, provided by AMP, NSJP, and NSJP's Columbia

²⁸³ Nina Lakhani, *'Do not bow': ex-Black Panther praises pro-Palestinian student protestors from prison*, The Guardian (Apr. 28, 2024), <https://www.theguardian.com/us-news/2024/apr/28/pro-palestinian-cuny-protesters-mumia-abu-jamal>.

²⁸⁴ *Cease Occupation*, Radical Discipleship (Apr. 29, 2024), <https://radicaldiscipleship.net/2024/04/29/cease-occupation/>.

chapters and affiliates and with their direct involvement; they were supported, encouraged, and reinforced by AMP and NSJP's pro-Hamas collaborators; and they engaged in violence against perceived enemies like CUNY's security personnel and Horowitz pursuant to AMP and NSJP's plan of using violence and mass disruptions to coerce CUNY into submitting to AMP and NSJP's pro-Hamas demands.

236. The attack on Horowitz was a natural and foreseeable consequence of AMP and NSJP's systematic direction, support, and encouragement for NSJP's chapters and affiliates' encampments and the violent, unlawful activity they pursued in service of accomplishing AMP and NSJP's agenda for their Popular University project, including attacks on law enforcement and innocent bystanders. The attack on Horowitz also directly furthered AMP and NSJP's goal of using the encampment to disrupt CUNY's operations and force CUNY into submitting to AMP and NSJP's pro-Hamas demands.

237. Absent AMP and NSJP's commands to NSJP's chapters and affiliates to establish encampments, support for them in doing so, and encouragement, support, celebration, and defense of their use of violence against perceived threats and enemies and other unlawful activity, NSJP's CUNY and Columbia chapters and affiliates would not have created the CUNY encampment and would not have been organized, galvanized, and willing to violently attack Horowitz as a perceived enemy for simply holding an American flag. Nor would they have felt secure in doing so, with the belief that AMP and NSJP would work with their pro-Hamas collaborators to engage in propaganda on their behalf and arrange for monetary and other support to protect them from any potential legal or disciplinary consequences for doing so.

238. That the attack on Horowitz was a foreseeable consequence of AMP and NSJP's support for the CUNY encampment and plans for it disrupt the CUNY's operations is further

demonstrated by AMP and NSJP's role in organizing, assisting with, and defending coordinated riots by NSJP's CUNY and Columbia chapters and affiliates at their respective campuses just four days later on April 30, 2024.

IX. AMP and NSJP continued supporting their CUNY and Columbia chapters during and after they rioted and engaged in mass violence and property destruction in "defense" of their encampments.

A. AMP and NSJP assisted NSJP's CUNY and Columbia chapters and affiliates with rioting on their campuses.

239. With AMP and NSJP's direct encouragement, organizational assistance, and propaganda cover, NSJP's CUNY and Columbia chapters and affiliates organized mob rioting on their campuses, violently taking over buildings and destroying campus property, kidnapping and beating campus staff, and engaging in running street battles with law enforcement and security personnel.

240. On April 30, 2024, after days of unlawful trespassing, violent attacks on bystanders, campus safety officers, and police, and mass discrimination, violence, and intimidation against Jewish and Israeli students related to the CUNY and Columbia encampments, the NYPD prepared to sweep and shut down the encampments at both schools. CCNY President Boudreau published a statement announcing an emergency closure of the campus, describing how the dangerous, disruptive, and unlawful encampment and protests by NSJP's CUNY chapters and affiliates were "more contentious and violent than anything we've seen on campus before," posed an "extraordinary threat," and violated CCNY and CUNY regulations.²⁸⁵ Boudreau's request to shut down the encampment was ignored by the NSJP chapters and affiliates running the CUNY encampment.

²⁸⁵ Vincent Boudreau, *Emergency Campus Closing*, Office of the President (Apr. 30, 2024), <https://www.ccny.cuny.edu/presidentsoffice/blog/emergency-campus-closing>.

241. In advance of the sweep, CUNY for Palestine joined with AMP and NSJP's pro-Hamas collaborators, including Palestinian Youth Movement and The People's Forum, to rally protestors to the CUNY and Columbia encampments to fight against the anticipated "invasion" by the police²⁸⁶ and to call for "numbers to defend the encampment NOW!"²⁸⁷ NSJP also joined with CUAD to call "all students" to mobilize to the encampment to defend against law enforcement:



²⁸⁶ The People's Forum (@peoplesforumnyc), Instagram, <https://www.instagram.com/p/C6Z8PvQgtbS/?hl=en> (Apr. 30, 2024).

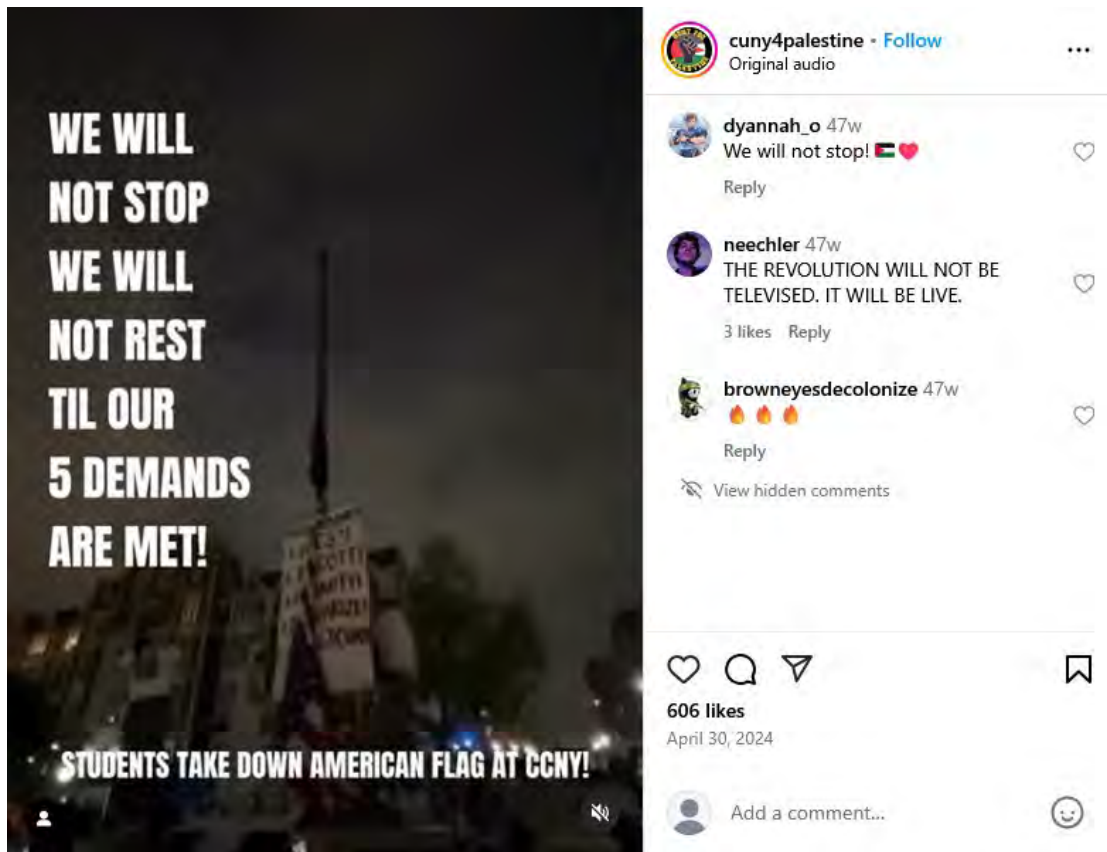
²⁸⁷ Habiba (@withlovehabiba), Instagram, <https://www.instagram.com/p/C6Z8xeLOSps/?hl=en> (Apr. 30, 2024).



242. As evening began, NSJP's chapters and affiliates at CUNY and Columbia set in motion a coordinated violent operation to damage their campuses and "resist" the coming law enforcement "invasion."

243. In a show of "defiance" to law enforcement and to prepare themselves psychologically for their coming riot, NSJP's CUNY chapters and affiliates dramatically tore down the American flag from the flagpole in the center of the CUNY encampment—leaving only the Palestinian flag flying—with CUNY for Palestine posting a video overlaid with dramatic music.²⁸⁸

²⁸⁸ CUNY for Palestine (@cuny4palestine), Instagram, https://www.instagram.com/p/C6aBtEptZa_/?hl=en (Apr. 30, 2024).



244. Following the mobilization calls from NSJP and its CUNY and Columbia chapters and affiliates for rioters to assemble at CCNY and Columbia to violently defend the encampments against police, the chapters and affiliates put their plan with AMP and NSJP for a joint riot on their campuses into action.

245. At Columbia, a mob of hundreds of rioters associated with NSJP's chapters and affiliates and their encampment stormed into Hamilton Hall and seized it, declaring it "Hind's Hall" and draping a banner proclaiming "Intifada" from the building's pediment. The NSJP rioters smashed through glass on the building's front doors with hammers and used bike locks, metal barricades, and tables to fortify the building after they seized it—intending to resist a counter-siege

by law enforcement.²⁸⁹ The rioters “managed to disable the elevator, and threw hundreds of chairs from the classrooms down the stairs before zip-tying them together.”²⁹⁰ “They also removed tabletops from desks and drilled them into windows as barricades.”²⁹¹



²⁸⁹ Luke Tress, *Columbia protesters called janitors ‘Jew-lovers’ during 2024 building takeover, complaint says*, The Times of Israel (Mar. 17, 2025), https://www.timesofisrael.com/liveblog_entry/columbia-protesters-called-janitors-jew-lovers-during-2024-building-takeover-complaint-says/; Alex Kent and Matt Stieb, *Intelligencer* (May 1, 2024), <https://nymag.com/intelligencer/article/columbias-hamilton-hall-takeover-photos-from-inside.html>

²⁹⁰ Matthew Sedacca, *Columbia janitor reveals secret plans left behind by anti-Israel protesters who took over Hamilton Hall armed with zip ties, chains*, New York Post (May 10, 2024), <https://nypost.com/2024/05/10/us-news/columbia-janitors-reveal-secret-plans-left-behind-by-anti-israel-protesters-who-took-over-hamilton-hall/>.

²⁹¹ *Id.*



246. In their assault upon the building, the NSJP encampment rioters beat a student who tried to block them from entering.²⁹² Inside the building were four superintendents employed by Columbia to maintain the campus.²⁹³ The rioters violently shoved the superintendents, threatened them—“I’m going to get twenty guys up here to fuck you up”—and then beat them, with rioters striking one on the back and smashing furniture into another as they tried to make their way out of the building.²⁹⁴ The NSJP rioters mocked the superintendents, telling them, “You work for the

²⁹² Kenneth Garger, Jack Morphet, Joe Marino, and Emily Crane, *Violent pro-terror rioters shouting ‘Intifada!’ smash their way into Columbia University academic building in latest campus chaos*, New York Post (Apr. 30, 2024), <https://nypost.com/2024/04/30/us-news/columbia-university-protesters-take-over-hamilton-hall/>

²⁹³ Sedacca, *supra* note 290; Ryan King, *supra* note 251.

²⁹⁴ Collin Anderson, *Columbia Declined To Investigate Swastikas Scrawled Throughout Hamilton Hall Because They Were ‘Written in Chalk and Could Be Erased’: Complaint*, The Washington Free Beacon (Mar. 17, 2025), <https://freebeacon.com/campus/columbia-declined-to-investigate-swastikas-scrawled-throughout-hamilton-hall-because-they-were-written-in-chalk-and-could-be-erased-complaint/>; Tress, *supra* note 289.

Jews” and “You’re a Zionist.”²⁹⁵ The superintendents were unable to escape the building because the rioters had zip-tied and locked the entrances and exits, trapping them in the building against their will while attacking them. After hours of insults, attacks, and forced imprisonment, the rioters allowed the superintendents to escape.²⁹⁶



²⁹⁵ Anderson, *supra* note 294.

²⁹⁶ Katia Porzecanski and Laura Nahmias, *Columbia Threatens to Expel Students Who Took Over Building*, Bloomberg (Apr. 30, 2024), <https://www.bloomberg.com/news/articles/2024-04-30/columbia-student-take-over-campus-building-yale-police-clear-encampment>; Sedacca, *supra* note 290.



247. The rioters accidentally left behind the planning materials they used to coordinate and execute their assault on Hamilton Hall, which were later discovered by Columbia’s custodial staff.²⁹⁷ The plans reflected that the rioters were highly organized—indicating the involvement of professional assistance and central coordination from NSJP and its pro-Hamas collaborators, who had already assisted with the attack by mobilizing rioters to Columbia’s campus—making use of “floor plans and supply lists noting locations of barricading equipment” and “a ‘task list’ with items including setting up a pulley system and ‘security shifts’” and “a schedule listing the times of the Muslim call to prayer.”²⁹⁸ The rioters had “mapped everything out” within the building and had designated their own logistical points and layout: “They had a food room, a prayer room, the smoking room...they were in there for the long haul.”²⁹⁹ The repair cost for the damage the rioters inflicted on Hamilton Hall has been estimated in the millions.³⁰⁰

248. NSJP publicly demonstrated its involvement in planning, supporting, and stoking the riot by joining CUAD in spreading video taken of CUAD’s rioters outside the building, wearing masks and forming a human chain to physically resist any attempts by law enforcement to retake Hamilton Hall and arrest the rioters who were beating the superintendents, destroying property, and trespassing. NSJP further joined CUAD in taking credit for the rioters’ violent takeover of the building, proudly declaring it as part of NSJP’s “student intifada.”³⁰¹

²⁹⁷ Sedacca, *supra* note 290.

²⁹⁸ *Id.*

²⁹⁹ *Id.*

³⁰⁰ *Id.*

³⁰¹ Writers Against the War on Gaza (@wawog_now), Instagram, <https://www.instagram.com/p/C6X2CpZMypj/> (Apr. 30, 2024); https://www.instagram.com/p/C6X_BNZOS0p/ (Apr. 30, 2024); National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/p/C6X_TiWOUFI/?img_index=1; PYM NYC (@nycpym), Instagram, https://www.instagram.com/p/C6YAP6Yu_0E/?img_index=1 (Apr. 30, 2024); PYM NYC (@nycpym), Instagram, <https://www.instagram.com/p/C6YGIXfOH5u/> (Apr. 30, 2024).



cuapartheiddinvest and nationalsjp ...
Original audio

cuapartheiddinvest !! UPDATE:
STUDENTS FORM HUMAN CHAIN IN
FRONT OF HAMILTON TO PROTECT
PROTESTORS WHO HAVE OCCUPIED
HAMILTON. JOIN US NOW.
Edited · 46w

fatiii_oui 🇵🇸🇵🇸🇵🇸🇵🇸🇵🇸
45w Reply

eunicekelsey crying!!! 🇵🇸🇵🇸 every
single one of you is so brave, we are
are so, SO proud of you all. 🇵🇸🇵🇸
46w Reply

lizzeth_h Ceasefire now!!! @potus
@whitehouse!!!!!!End the Genocide!!!

7,211 likes
April 30, 2024

Add a comment...



wawog_now and 3 others ...
Original audio

wawog_now DISCLOSE! DIVEST!
DEOCCUPY! Columbia students have
taken a building.

Hamilton Hall is the campus's main
administrative building, a locus of
corrupt activity for the war profiteers,
genocide deniers, and cop-lovers who
continue to try to suppress the
student movement.

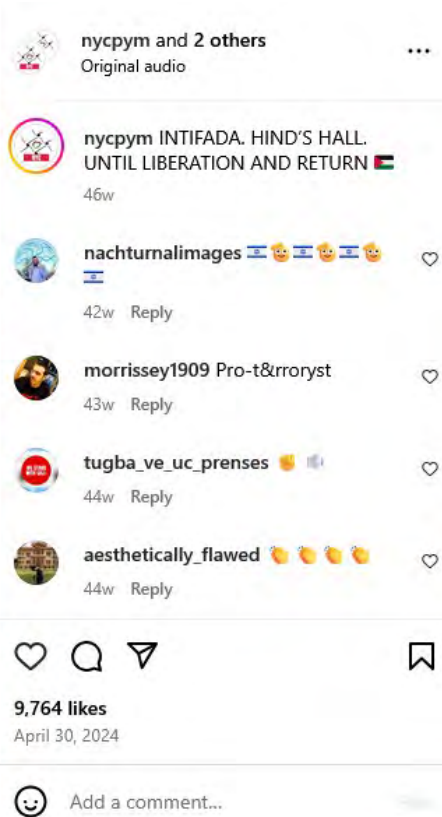
United, the students won't be
defeated. History is on their side.

Free Palestine, from the river to the
sea.
Edited · 46w

aubrefause 🇵🇸🇵🇸🇵🇸

6,566 likes
April 30, 2024

Add a comment...





nycpym and nationalsjp ...

nycpym 1968//2024 Long live the student intifada!

Columbia students have once again occupied Hamilton Hall for divestment from genocide. All eyes on Rafah! All eyes on Gaza!

In April 1968, Columbia students occupied Hamilton Hall, with the demand that Columbia end its ties with the Institution for Defense Analysis, an organization that aided the US war in Vietnam. Today, students are demanding divestment from the Israeli war machine that has claimed over 34 thousand Palestinian lives in the past 7 months alone. Our demands are just and clear as day, we will no longer be complicit in

6,663 likes
April 30, 2024

Add a comment...



nycpym and nationalsjp Original audio ...

nycpym 3 AM, live from in front of the liberated Hind's Hall, the students shall not be moved 🇵🇸

#columbia #columbiauniversity
#palestine #nyc #weshallnotbemoved
Edited · 46w

ari.lebay.3 ❤️ ❤️ ❤️
42w Reply

nouurrriiii #freepalestine #palestine
#savepalestine #gaza #islam
#palestina #muslim #boycottisrael
#westbank #palestinewillbefree
#bds #savegaza #palestinian
#savesheikhjarrah #allah
#gazaunderattack #apartheid

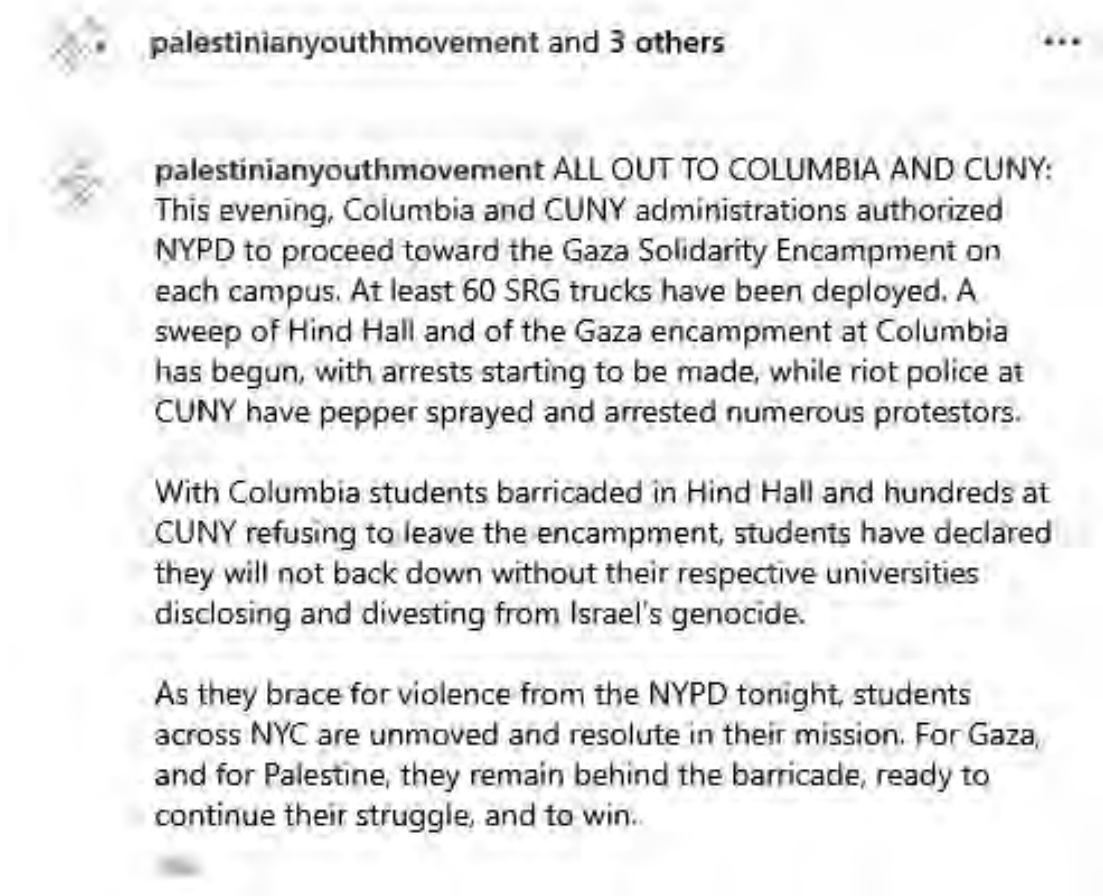
22,258 likes
April 30, 2024

Add a comment...

249. While NSJP's Columbia chapters and affiliates were rioting and violently taking over Hamilton Hall, NSJP's CUNY chapters and affiliates were fist-fighting with police to prevent their entry into the CUNY encampment.

250. As this was occurring, NSJP joined with CUNY for Palestine and its other pro-Hamas collaborators in mobilizing reinforcements for the rioters from NSJP's CUNY and Columbia chapters and affiliates who were fighting with police and had taken over Hamilton Hall:





251. Due to the use of locks, barricades, and human-wall tactics by the rioters at Columbia to prevent law enforcement entry into Hamilton Hall, police had to resort to using a lift truck to enter and retake the building. As the police did so, the rioters attacked, attempting to drive them off. NSJP joined in posting footage of police attempts to enter the building and of the rioters attacking the police and directed the rioters to continue their resistance and violence against the police officers.³⁰²

252. AMP joined with its New Jersey chapter in defending the Hamilton Hall rioters' seizure of the building, decrying the NYPD for "limiting entry of supplies and necessities" to the

³⁰² PYM NYC (@nycpym), Instagram, https://www.instagram.com/nycpym/p/C6aGDsXtNLU/?img_index=1 (Apr. 30, 2024); Palestinian Youth Movement (@palestinianyouthmovement), Instagram, <https://www.instagram.com/palestinianyouthmovement/p/C6aGVreglHq/> (Apr. 30, 2024).

occupying rioters, arranging for “jail support” for arrested rioters, mobilizing reinforcements for the rioters, and calling for Columbia to “MEET THE DEMANDS OF THE STUDENTS!!”³⁰³

253. As the riot at Columbia continued, an army of hundreds of the Columbia rioters mobilized and advanced on CUNY’s CCNY campus from the south.³⁰⁴ This army of rioters from NSJP’s Columbia chapters and affiliates had coordinated its march on CCNY with NSJP’s chapters and affiliates at the CUNY encampment. As the Columbia rioters were on the move, rioters from the CUNY encampment began mobbing the front door of CCNY’s Shepard Hall.³⁰⁵

254. Soon after, approximately 300 of the Columbia rioters arrived at a fence CUNY had erected on 140th Street, trying to tear through it. The coordinating armies of rioters from NSJP’s CUNY and Columbia chapters and affiliates then simultaneously attacked CUNY’s officers on the CCNY campus and the combined line of CUNY and NYPD officers defending against external breach of the campus. The on-campus rioters from NSJP’s CUNY chapters and affiliates were able to break through a line of CUNY officers and link up with their off-campus reinforcements from NSJP’s Columbia chapters and affiliates.

255. A splinter of the now-combined armies of rioters from NSJP’s chapters and affiliates broke off and smashed through the glass doors of CCNY’s administration building, where they “vandalized offices, covered security cameras with paint and trashed files and computers” before trying “to barricade themselves in the Financial Aid Office.”³⁰⁶ Just like at Columbia, the rioters were highly organized and had planned and prepared for their attack in advance with the

³⁰³ American Muslims for Palestine – NJ (@amp_newjersey), Instagram, https://www.instagram.com/amp_newjersey/reel/C6aIqsNAozA/?hl=en (Apr. 30, 2024).

³⁰⁴ Vincent Boudreau, *President’s Statement on Encampment* (May 1, 2024), <https://www.ccny.cuny.edu/presidentsoffice/blog/presidents-statement-encampment>.

³⁰⁵ *Id.*

³⁰⁶ Felix V. Matos Rodriguez, *A Difficult Decision* (May 2, 2024), <https://www.cuny.edu/about/chancellor/letters/5-02-24-difficult-decision/>.

evident intent to seize and occupy the building for an extended period, using assault kits with “chains, flares, a bolt cutter and box cutters” in their attack on the building.³⁰⁷ CUNY officers were eventually able to fight into the building and make 31 arrests.

256. In the fight against the rioters from NSJP’s CUNY and Columbia chapters and affiliates, two of CUNY’s officers were hospitalized.³⁰⁸

257. While the skirmish over the CCNY administrative building occurred, the rioters at CCNY received further reinforcements mobilized from off-campus. On information and belief, these reinforcing rioters were mobilized by NSJP, its chapters and affiliates, and its pro-Hamas collaborators. These reinforcements coordinated with the rioters from NSJP’s chapters and affiliates already at the CCNY campus, fighting to breach the security perimeter of NYPD officers and enter the campus while the on-campus rioters lit flares and formed a mob near the 138th Street gate.³⁰⁹

³⁰⁷ *Id.*

³⁰⁸ Boudreau, *supra* note 304.

³⁰⁹ Matos Rodriguez, *supra* note 306; J. Brian Charles, *The Tipping Point: Why One College Decided to Call the Cops on Protesters*, The Chronicle on Higher Education (May 10, 2024), <https://www.chronicle.com/article/the-tipping-point-why-one-college-decided-to-call-the-cops-on-protesters>; Nic White, *Manhattan turns into a tinderbox as hundreds of furious students face off with cops outside City College with flares hurled at police and pro-Palestine protesters tear gassed*, Daily Mail (Apr. 30, 2024), <https://www.dailymail.co.uk/news/article-13369529/NYC-college-protest-NYPD-CCNY-City-College.html>.



258. The on-campus rioters threw one of these flares onto the recently replaced roof of CCNY's administration building, causing at least \$350,000 in property damage.³¹⁰ The NYPD sent its own reinforcements to the CCNY campus after it finished breaking up the encampment at Columbia University.³¹¹ These officers assisted with preventing the newly arrived rioters from breaching the perimeter around CCNY.

259. A multi-hour street battle ensued between the combined forces of the CUNY police and NYPD and the combined army of rioters from NSJP's CUNY and Columbia chapters and affiliates.

260. By the end of the night, police had arrested over 170 people at CCNY. Of those arrested, 60% were not affiliated with CUNY,³¹² reflecting the close cooperation and coordination between NSJP's CUNY and Columbia chapters and affiliates and the significance of the calls to "mobilize" to participate in the riots by NSJP, its chapters and affiliates, and its pro-Hamas collaborators.

261. The total cost to CUNY of the encampment and riots by the NSJP chapters and affiliates is reportedly at least \$3 million.³¹³ These damages include the roof that rioters destroyed when they threw a flare onto it (\$350,000), windows and doors they smashed apart (\$250,000), and surveillance cameras they destroyed (\$600,000). The costs also include the barriers erected at CCNY and the cost of added security to support CUNY's public safety officers. City Council members have lamented that these millions of dollars should have gone to CUNY's academic

³¹⁰ Carl Campanile, *Anti-Israel protesters caused \$3M worth of damage, security costs at City college campus: 'Real shame'*, New York Post (May 28, 2024), <https://nypost.com/2024/05/28/us-news/anti-israel-protesters-caused-3m-worth-of-damage-security-costs-at-city-college-campus/>.

³¹¹ Matos Rodriguez, *supra* note 252.

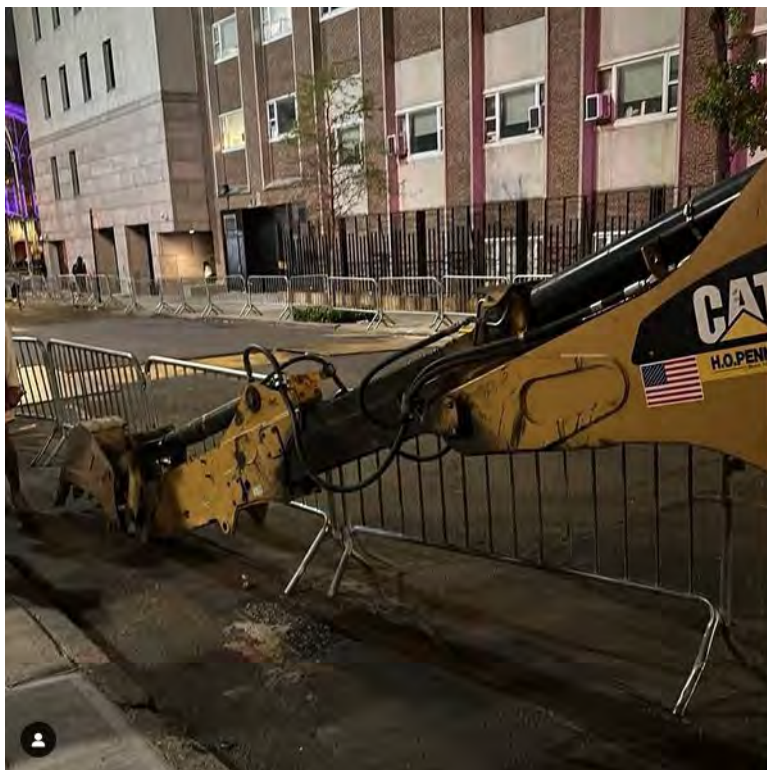
³¹² *Id.*


³¹³ Campanile, *supra* note 310.


programs and to serving students, but due to the criminal and violent conduct by NSJP's chapters and affiliates, encouraged, supported, and directed by AMP and NSJP, these millions of taxpayer dollars must go to dealing with the aftermath of the encampment and riots instead.

262. As the violence of the night was occurring, AMP and NSJP posted and joined in messages celebrating, supporting, and encouraging the rioters from its CUNY and Columbia chapters and affiliates and castigating any opposition to their riotous criminality as unlawful, fascist, and "Zionist."³¹⁴

³¹⁴ National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/nationalsjp/p/C6aG162NDF2/> (Apr. 30, 2024); PYM NYC (@nycpym), Instagram, https://www.instagram.com/nycpym/p/C6aWEFXNfGz/?img_index=1 (Apr. 30, 2024); AJP Action (@ajpaction), Instagram, https://www.instagram.com/p/C6aURfUAsJ1/?hl=en&img_index=1 (Apr. 30, 2024).




 **nationalsjp** • Follow

 **nationalsjp** Columbia brought in a Caterpillar machine, the same company whose machinery bulldozes homes in Gaza and throughout Palestine. The same devices that have caused precious blood to spill in order to pave the way for settler colonies.

Columbia, shame on you. You will never be able to remove this blood stain from your ivory tower.

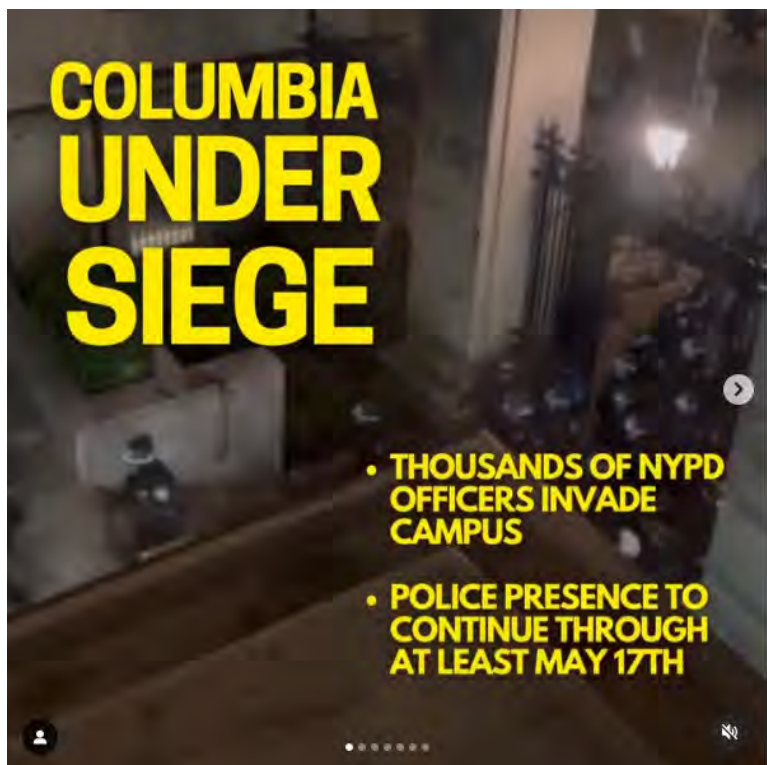
Palestine we LOVE you and we will hold strong for every single Palestinian on this Earth. 🇵🇸


46w


 **reda_dekaki**
45w Reply

9,589 likes
April 30, 2024

Add a comment...



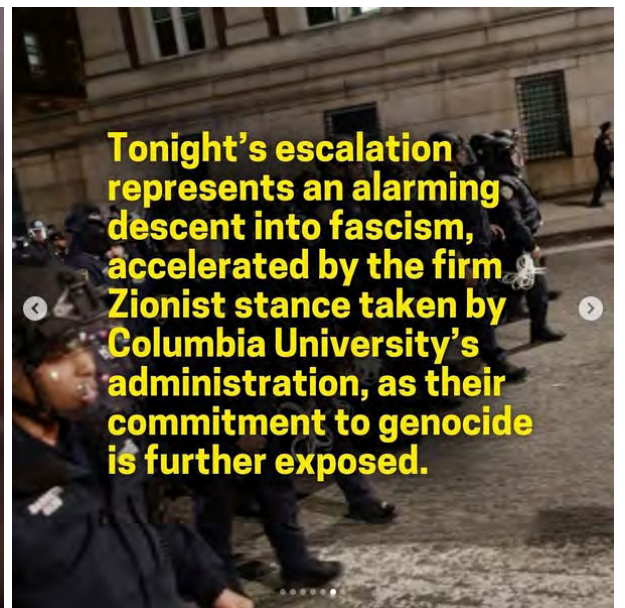
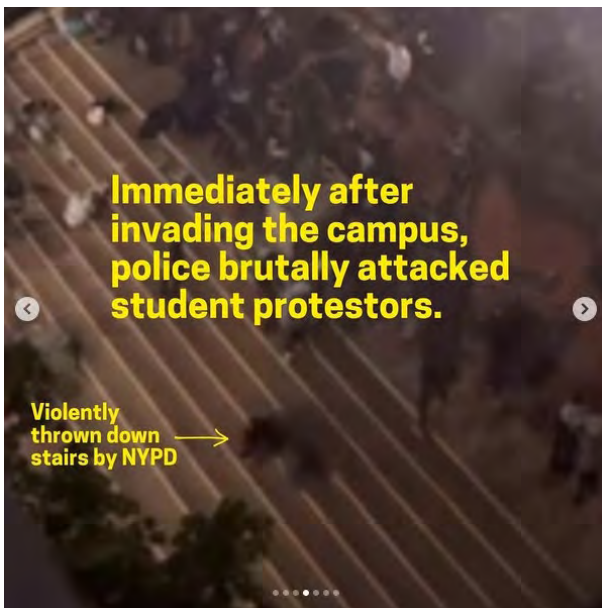
 **nycpym and 2 others**

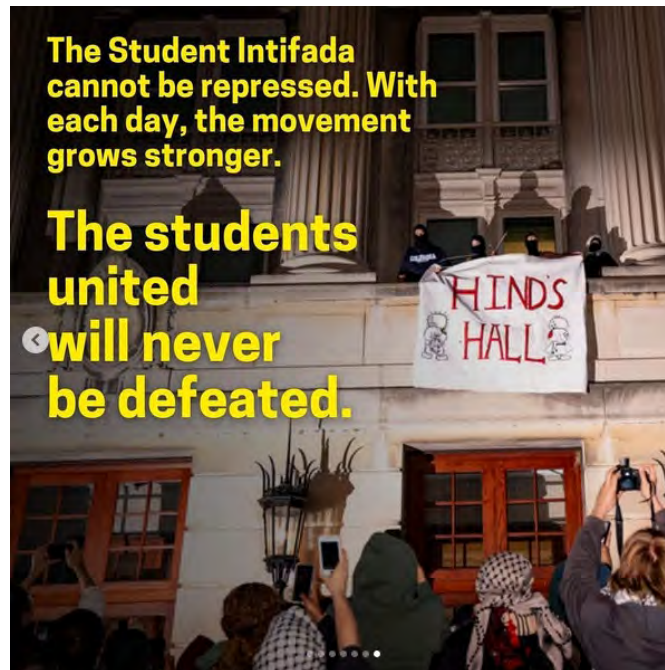
 **nycpym** The NYPD is violently invading several student encampments across New York City tonight and has occupied at least one campus, Columbia University. Columbia's administration, standing cowardly behind Zionist donors to defend the ongoing genocide on Gaza, are inviting this invasion onto their own campus. These developments mark an acceleration of the University's rapid descent into fascism, spearheaded by President and Zionist sellout Minouche Shafik.

In rejecting NYPD's presence on campus grounds, students are also drawing attention to the links between the NYPD and the Israeli Occupation: links that are both

90,964 likes
April 30, 2024

Add a comment...





263. On information and belief—based on AMP and NSJP’s close working relationship with NSJP’s CUNY and Columbia chapters and affiliates, their role in creating, directing, and supporting the encampments at Columbia and CUNY, and their role in encouraging, directing, and mobilizing reinforcements for the riots as they were ongoing and then defending them after the fact, AMP Executive Director Abuirshaid’s visit to the Columbia encampment six days before the riots, and the evidence of professional planning and preparation in the riots at both campuses—AMP and NSJP were directly involved in ordering, planning, and executing the riots.

264. AMP and NSJP’s direct support for the encampment riots at CCNY and Columbia by NSJP’s CUNY and Columbia chapters and affiliates demonstrate that AMP and NSJP had always intended for the CUNY encampment to be violent and unlawful in disrupting its campus, that they were systematically involved in ordering, encouraging, and assisting violence in connection with the CUNY encampment, and that the attack on Horowitz was therefore a foreseeable consequence of AMP and NSJP’s actions and an extension of their plans related to the CUNY encampment.

265. This is further confirmed by AMP and NSJP’s close continued cooperation with and support for NSJP’s CUNY and Columbia chapters and affiliates following the riots of April 30, 2024, which demonstrate that the violence perpetrated by NSJP’s CUNY and Columbia chapters and affiliates in connection with their encampments—including the attack on Horowitz—was part of AMP and NSJP’s intention and design.

B. AMP and NSJP defended and continued their close cooperation with their CUNY and Columbia chapters and affiliates after the riots on April 30, 2024.

266. Following the mass violence and criminality perpetrated by NSJP’s CUNY and Columbia chapters and affiliates, AMP and NSJP continued to be intimately involved with NSJP’s CUNY and Columbia chapters and affiliates. AMP and NSJP continued to explicitly encourage

and support the CUNY and Columbia chapters and affiliates' violence and unlawfulness by devoting resources to propagandizing on their behalf, defending and justifying their blatantly unlawful riotous violence, seeking to protect them and their rioters from any legal or disciplinary consequences, and continuing to cooperate closely with them on disruptive events and operations.

267. On May 1, 2024, the day after the violent riots by NSJP's chapters and affiliates at CUNY and Columbia, NSJP named Columbia's and CUNY's presidents first and foremost in its "Hall of Shame" for "unleashing police to brutalize their students," warning that they "will be remembered for brutality and genocide" and commanding its chapters and affiliates to "NAME THEM AND SHAME THEM."³¹⁵ NSJP also joined with its affiliate Law Students for a Free Palestine in stating that it "strongly condemns the deplorable use of police violence on university campuses against pro-Palestine students protestors," specifically naming Columbia and City College of New York.³¹⁶ NSJP publicized a dramatic image glorifying the rioters in its Columbia chapters and affiliates seizing Hamilton Hall, with the caption stating "HIND'S HALL WILL LIVE FOREVER."³¹⁷

268. NSJP joined with CUNY for Palestine in organizing and announcing a second encampment at Stony Brook University and directing a mob to "[g]et down to the Staller steps at SBU!! Defend the encampment!"³¹⁸ NSJP also joined CUNY for Palestine in issuing a declaration

³¹⁵ National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/nationalsjp/p/C6b8f6Uuubo/?img_index=1 (May 1, 2024).

³¹⁶ Law Students for a Free Palestine (@lsfpnational), Instagram, https://www.instagram.com/lsfpnational/p/C6cCfUmuPNt/?img_index=2 (May 1, 2024).

³¹⁷ National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/nationalsjp/p/C6aej6gs8xA/?img_index=1 (May 1, 2024).

³¹⁸ CUNY for Palestine (@cuny4palestine), Instagram, <https://www.instagram.com/cuny4palestine/p/C6cMdKpOuod/> (May 1, 2024).

of defiance and hatred against law enforcement in response to police actions shutting down multiple of NSJP's violent encampments, including at Columbia and CCNY.³¹⁹



³¹⁹ National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/nationalsjp/p/C6bdJDDu_F3/ (May 1, 2024).



269. AMP issued a statement with its action arm, AJP Action, spreading a false propaganda narrative to defend the NSJP rioters from consequences for imprisoning and beating

innocents, fighting police, and causing millions of dollars' worth of damage, claiming that the NYPD had "descended upon their peaceful protest" in an "egregious violation of student rights."³²⁰

270. On May 4, 2024, NSJP joined its pro-Hamas collaborator Palestinian Youth Movement in publicizing a video glorifying NSJP's chapters and affiliates' unlawful encampments and their violent opposition to law enforcement as "[t]he student uprising."³²¹ The video identified NSJP's chapters and affiliates at Columbia as the spearhead for its Popular University project and valorized their violent resistance to police and their takeover of Hamilton Hall, alongside similar footage and commentary commending and encouraging violent resistance to law enforcement by NSJP's chapters at other campuses across the country.

271. On May 7, 2024, NSJP joined its pro-Hamas collaborators in publicizing a video valorizing NSJP's Columbia chapters and affiliates' violent seizure of Hamilton Hall and riot on April 30, 2024.³²²

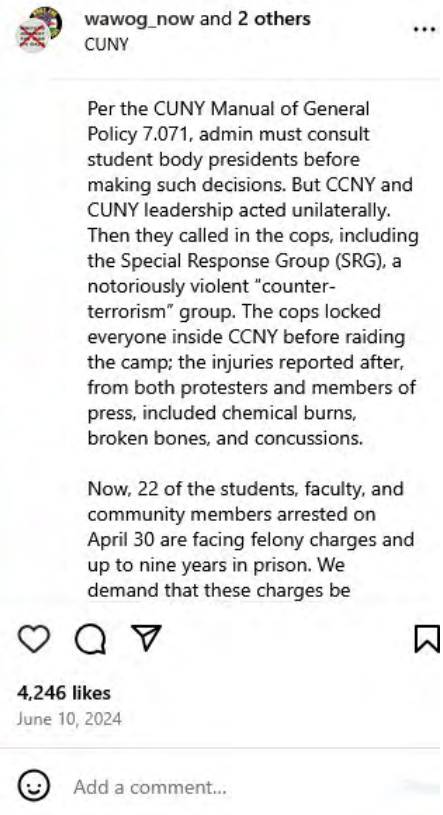
272. On June 10, 2024, NSJP joined CUNY for Palestine in agitating for charges to be dropped against the "CUNY 22," a collection of students, faculty, and others who were facing felony charges for their riotous, violent conduct operating under NSJP's orders.³²³

³²⁰ AJP Action (@ajpaction), Instagram, <https://www.instagram.com/ajpaction/p/C6cHFfAA3AB/?hl=en> (May 1, 2024).

³²¹ Palestinian Youth Movement (@palestiniayouthmovement), Instagram, <https://www.instagram.com/palestiniayouthmovement/reel/C6j6RbpgZTI/> (May 4, 2024).

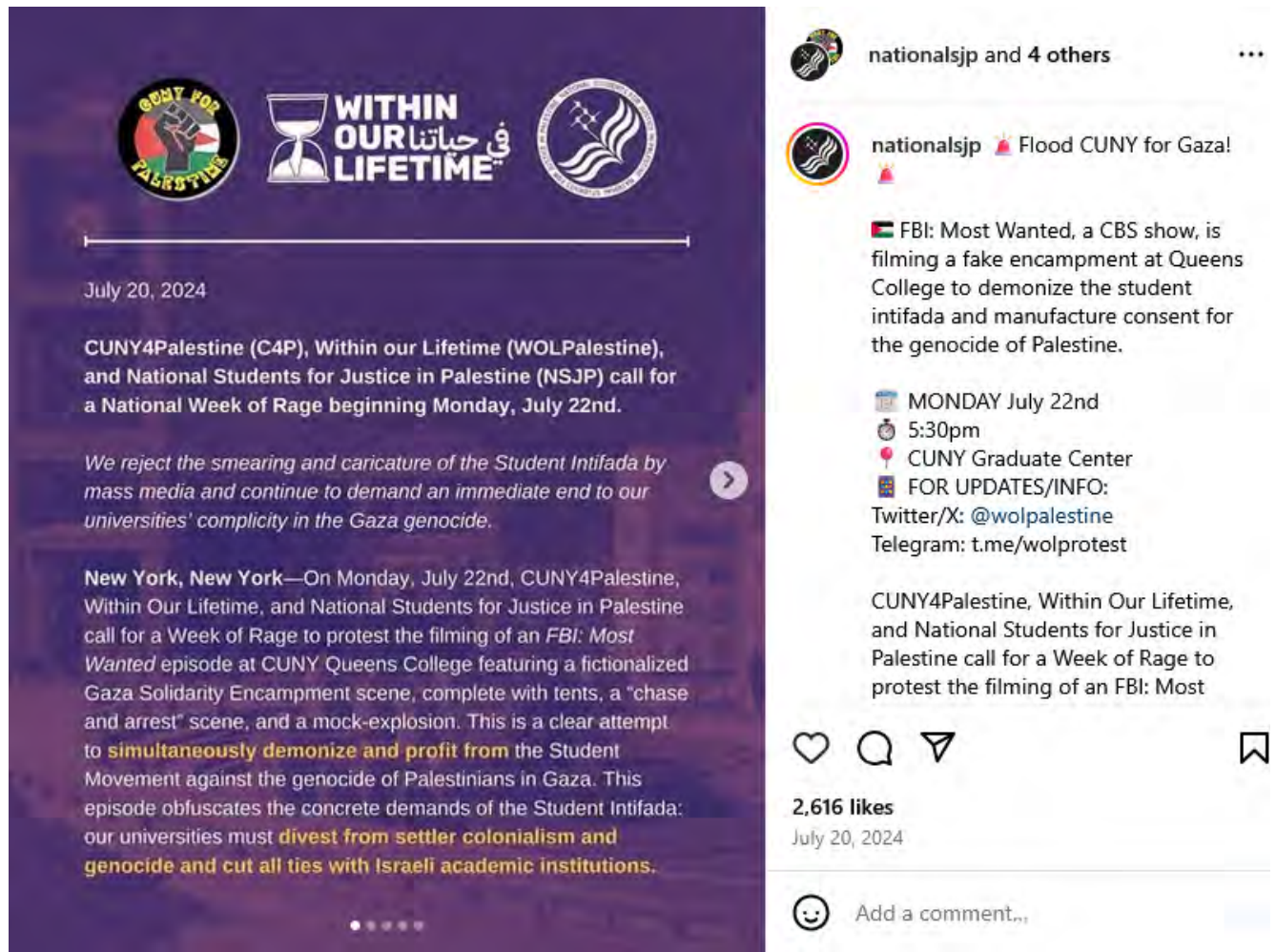
³²² PYM NYC (@nycpym), Instagram, <https://www.instagram.com/nycpym/reel/C6q-ZAKOyxA/> (May 7, 2024).

³²³ Writers Against the War on Gaza (@wawog_now), Instagram, https://www.instagram.com/wawog_now/p/C8C05rKuTep/?img_index=1 (June 10, 2024).



273. On July 20, 2024, NSJP joined CUNY for Palestine and Within Our Lifetime in ordering a “National Week of Rage” to begin on July 22, 2024, to “take action all week on every campus” of CUNY:³²⁴

³²⁴ National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/nationalsjp/p/C9qlRX0tiXT/?img_index=1 (July 20, 2024).



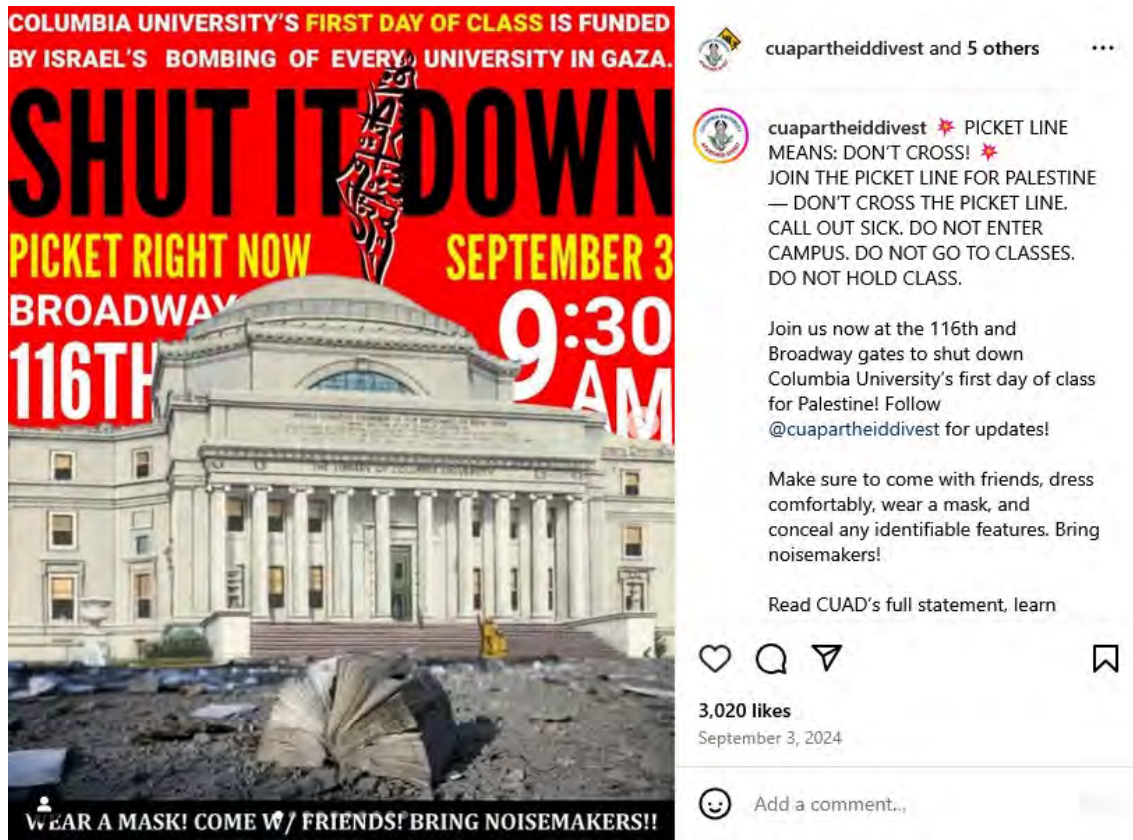
274. On August 26, 2024, NSJP joined with CUAD and its other Columbia chapters and affiliates in condemning Meta for banning CUAD’s account and declaring that “the Student Intifada will live on until all our demands are met and full liberation is realized.”³²⁵

275. On August 29, 2024, NSJP joined with CUNY for Palestine to organize a mass “Flood NYC for Gaza National Action” on September 2, 2024.³²⁶

³²⁵ PYM NYC (@nycpym), Instagram, https://www.instagram.com/nycpym/p/C_J-EUPNWmf/?img_index=1 (Aug. 26, 2024).

³²⁶ National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/nationalsjp/p/C_Qod8Cu5xb/ (Aug. 29, 2024).

276. On September 3, 2024, NSJP joined with CUAD and its other Columbia chapters and affiliates in ordering a mass picket line at Columbia to prevent students and faculty from attending classes, demanding that their protesters “wear a mask, and conceal any identifiable features” and “[b]ring noisemakers!”



277. On September 24, 2024, NSJP joined with its chapters and affiliates at CUNY to order a “SHUT DOWN MIDTOWN AGAINST NETANYAHU” protest action, coordinating “[s]tudents from CSI, SVA, CCNY, CUNY Grad, FIT, TNS, [CUNY for Palestine], CUNY Law, Brooklyn College, and Hunter College” to protest outside the headquarters of Birthright Israel, a nonprofit organization that arranges for teenagers to do tours of Israel.³²⁷

³²⁷ CUNY Law SJP (@cunylawsjp), Instagram, <https://www.instagram.com/cunylawsjp/p/DAT6RvgyTIR/> (Sep. 24, 2024).

278. On October 2, 2024, NSJP joined with CUNY for Palestine and its chapters and affiliates at The New School and NYU to organize a celebration for the one-year anniversary of Hamas’s October 7th massacre, using the “Flood New York City for Palestine” rhetoric that referred to Hamas’s name (Operation Al-Aqsa Flood) for the October 7th attack.³²⁸

279. On October 4, 2024, NSJP joined CUNY for Palestine in organizing and promoting a lecture titled “One Year Since Al-Aqsa,” commemorating the Hamas terror attack.³²⁹ NSJP also joined with CUAD in ordering a walkout of “student & workers of Columbia” on the one-year anniversary of the October 7th massacre, to disrupt “business as usual.”

280. On October 19, 2024, NSJP joined its CUNY chapters and affiliates in celebrating the CUNY Graduate Center’s adoption of a boycott divestment and sanction resolution against Israel, claiming it as a victory for the CUNY encampment and using a picture of the encampment in celebration.³³⁰

281. On November 20, 2024, NSJP joined CUNY for Palestine and its other CUNY chapters and affiliates in organizing and announcing CUNY’s participation in the “international university strike against genocide.”³³¹

282. On November 25, 2024, NSJP joined CUNY for Palestine and its other CUNY chapters and affiliates in condemning a hearing on rising antisemitism at CUNY by the New York City Council as a sham.³³²

³²⁸ New School Students for Justice in Palestine (@tns.sjp), Instagram, https://www.instagram.com/tns.sjp/p/DAovIRayVgz/?img_index=1 (Oct. 2, 2024).

³²⁹ CUNY for Palestine (@cuny4palestine), Instagram, <https://www.instagram.com/cuny4palestine/p/DAtHj6MOrYn/> (Oct. 4, 2024).

³³⁰ CUNY DGSC (@cunydgsc), Instagram, https://www.instagram.com/cunydgsc/p/DBT_rp5uZ-6/?img_index=1 (Oct. 19, 2024).

³³¹ CUNY for Palestine (@cuny4palestine), Instagram, https://www.instagram.com/cuny4palestine/p/DCnq6xOsGnD/?img_index=1 (Nov. 20, 2024).

³³² CUNY for Palestine (@cuny4palestine), Instagram, https://www.instagram.com/cuny4palestine/p/DCzhIVNSIyw/?img_index=2 (Nov. 25, 2024).

283. On December 2, 2024, NSJP again joined CUNY for Palestine and its other CUNY chapters and affiliates in condemning and agitating against the New York City Council’s finding that antisemitism had increased at CUNY.

284. On December 9, 2024, NSJP joined CUNY for Palestine and its Columbia chapters and affiliates in condemning Meta for suspending CUAD’s Instagram account and organizing a protest in response.³³³

285. On December 10, 2024, NSJP joined CUNY for Palestine and its other CUNY chapters and affiliates in a “campaign” to “expose the ways in which politicians and the CUNY administration collude to repress” their “activism.”³³⁴

286. On December 21, 2024, NSJP joined CUNY for Palestine in organizing and announcing a takeover of the Rose Reading Room at the New York Public Library³³⁵

287. On January 4, 2025, NSJP joined CUAD in castigating Columbia for arresting and disciplining the NSJP rioters that seized Hamilton Hall, beat the superintendents and held them prisoner, fought with police, and then laid siege to CUNY, demanding that Columbia drop all charges and discipline against them:

³³³ Jafra (@cujafra), Instagram, https://www.instagram.com/cujafra/p/DDXb4-TRV7M/?img_index=1 (Dec. 9, 2024).

³³⁴ CUNY for Palestine (@cuny4palestine), Instagram, https://www.instagram.com/cuny4palestine/p/DDZ5_7fRZ6Z/?img_index=1 (Dec. 10, 2024).

³³⁵ CUNY for Palestine (@cuny4palestine), Instagram, https://www.instagram.com/cuny4palestine/p/DD2F-07pfYx/?img_index=1 (Dec. 21, 2024).



cuapartheiddivest and 4 others
Columbia University

cuapartheiddivest 🇵🇸 There are no new beginnings in 2025 without Palestine. Columbia University is attempting to hide its contributions to genocide by finalizing student discipline in the middle of winter break when they think we aren't paying attention. But we won't forget Palestine, we won't stop fighting!

🔥 SEND THE LETTER demanding Columbia DROP THE CHARGES against students fighting for Palestinian liberation NOW, link in bio. 🔥

When we fight for Palestine, we don't fight alone. Show the administration our strength — share this post, share the petition!

15,487 likes
January 4

Add a comment...



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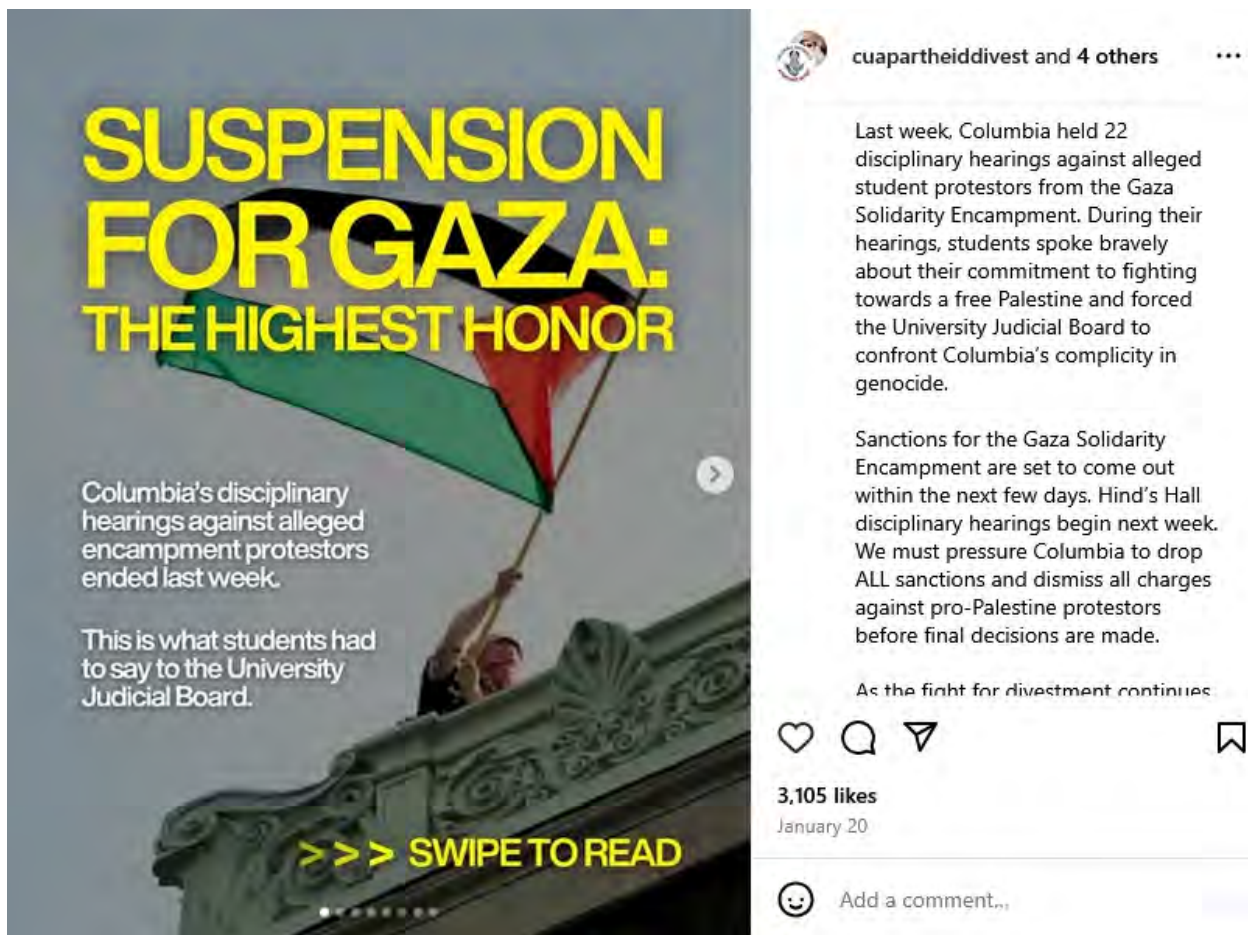
When we fight for Palestine, we don't fight alone. Show the administration our strength — share this post, share the petition!

15,487 likes
January 4

Add a comment...

288. On January 18, 2025, NSJP joined CUAD in organizing and directing an “ALL OUT TO COLUMBIA” protest on January 21, 2025, the first day of classes for the Spring 2025 semester. Together, they called for protestors to “join us to flood Columbia!” and “Demand the university drop the suspension, drop the charges.”

289. On January 20, 2025, NSJP again joined CUAD in agitating against any disciplinary action for their rioters who had seized Hamilton Hall while also declaring, that enduring disciplinary sanctions for NSJP’s pro-Hamas activism is “the highest honor.”



290. On January 21, 2025, NSJP joined CUNY for Palestine and its other CUNY chapters and affiliates in organizing a “CUNY Law teach-in” to agitate for NSJP’s Popular

University project demands and dropping the charges against rioters who participated in the siege of CCNY by NSJP's chapters and affiliates.³³⁶

291. On February 7, 2025, NSJP joined with its chapters and affiliates at The New School to organize a protest and press conference to call for charges to be dropped against the "CUNY 8:" 8 rioters who were facing felony charges after their arrest for participating in the NSJP siege against CCNY on April 30, 2024.³³⁷

292. On February 11, 2025, NSJP joined CUNY for Palestine and its other CUNY chapters and affiliates in organizing a disruption of a hearing by the CUNY Board of Trustees that was so severe and aggressive that the hearing was shut down and the NYPD had to be called in to remove NSJP protestors who unlawfully refused to leave and physically resisted removal.³³⁸

293. On February 12, 2025, NSJP joined CCNY SJP and its other CUNY chapters and affiliates in organizing and publicizing their members attempting to once again seize the public space at the CCNY campus where the CUNY encampment had been located.

294. On February 26, 2025, NSJP joined CUNY for Palestine in issuing a nationwide call to action to universities to refuse to cooperate with law enforcement and refuse to comply with their obligations to fight antisemitism and anti-Israeli discrimination under Title VI of the Civil Rights Act of 1964.³³⁹

295. On February 27, 2025, NSJP joined CUAD in organizing and publicizing a mass sit-in of aggressive, masked protestors at Barnard's Milbank Hall to "DEMAND[] THE

³³⁶ CUNY for Palestine (@cuny4palestine), Instagram, https://www.instagram.com/cuny4palestine/p/DFG8QhHtCr9/?img_index=1 (Jan. 21, 2024).

³³⁷ New School Students for Justice in Palestine (@tns.sjp), Instagram, https://www.instagram.com/tns.sjp/p/DFx2qk_OS0e/ (Feb. 7, 2025).

³³⁸ CUNY Law SJP (@cunylawsjp), Instagram, <https://www.instagram.com/cunylawsjp/reel/DF88aaVp7Gy/> (Feb. 11, 2025).

³³⁹ CUNY for Palestine (@cuny4palestine), Instagram, https://www.instagram.com/cuny4palestine/p/DGjYeLJOT3E/?img_index=4 (Feb. 26, 2025).

REVERSAL OF RECENT EXPULSIONS” related to rules-violating and unlawful conduct by NSJP’s chapters and affiliates at Columbia. NSJP involved itself in publicizing CUAD’s demands and updates on its “negotiations.”

296. On March 6, 2025, NSJP released a statement, joined by CUAD and its other Columbia chapters and affiliates, castigating Barnard and Columbia and the NYPD for the police response to a bomb threat made by members of NSJP’s Columbia chapters and affiliates during their violent takeover of Milstein Library—which NSJP claimed was for the purpose of “establish[ing] a liberated zone...to pressure the Barnard administration to reverse the expulsion and suspension of several Barnard students” related to the riots that NSJP and its CUNY and Columbia chapters and affiliates had perpetrated. In its statement, NSJP also attacked the NYPD for removing members of its CUNY chapters and affiliates who harassed and shut down the CUNY Board of Trustees hearing on February 11, 2025. NSJP threatened more aggressive and violent actions by its chapters in response, claiming “they fear the growth of student power, so they resort to brutality and manipulation to delay our movement’s victory. Unfortunately for them, repression breeds resistance ... We will not stop.”³⁴⁰

³⁴⁰ National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/nationalsjp/p/DG3EzL9RTky/?img_index=1 (Mar. 6, 2025).



297. NSJP then joined CUAD in creating and disseminating a propaganda narrative about NSJP’s Columbia chapters and affiliates’ violent takeover of Milstein Library and the bomb threat they caused, justifying their physical resistance against law enforcement attempts to remove their unlawful occupation.

298. On March 9, 2025, NSJP joined CUNY for Palestine in calling for a mass mobilization of its chapters and affiliates to “take over central spaces on campuses and assert our mass power” on March 11, 2025, in defiance against their universities, law enforcement, and the federal government.³⁴¹

³⁴¹ National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/nationalsjp/p/DG_6iI4slGu/?img_index=1 (Mar. 9, 2025).

299. On March 10, 2025, NSJP joined CUNY for Palestine in calling for NSJP's chapters and affiliates in New York City to "RISE UP & MARCH FOR OUR PEOPLE" in Washington Square Park, declaring that they would "march in defiance of crackdowns on students across New York City," that they "will not shy away in the face of federal threats."³⁴² The poster advertising the event used militant and anti-law enforcement rhetoric: "OUR CAMPUSES. OUR STREETS. OUR STRUGGLE." and "NO ICE. NO DHS. NO EXCEPTIONS."

300. On March 11, 2025, NSJP joined CUNY for Palestine in organizing and announcing an "URGENT CALL TO ACTION" demanding, "ALL HANDS ON DECK" for "CUNY WORKERS TO STAND IN SOLIDARITY WITH THE NSJP WALKOUT & SANCUTARY UNIVERSITIES" as part of a "city-wide mobilization" in defense of Mahmoud Khalil, a Hamas supporting leader of CUAD whom the Trump Administration was initiating deportation proceedings against for violating the terms of his residency in the United States by supporting terrorism.³⁴³ The post explicitly called on chapters and affiliates to "Respond to National Students for Justice in Palestine (NSJP) CALL TO ACTION: 12pm Walkout!" and to "Support your students responding to the NSJP call."

301. On April 15, 2025, NSJP joined CUNY for Palestine in coordinating over 80 organizations in coming together for the launch of a "Sanctuary & Popular University network" and the release of its accompanying "Sanctuary and Popular University Toolkit."³⁴⁴ NSJP's new toolkit resembled its previous toolkits: galvanizing its chapters and activists to take action to

³⁴² National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/p/DHCfzOZMSxq/> (Mar. 10, 2025).

³⁴³ CUNY for Palestine (@cuny4palestine), Instagram, https://www.instagram.com/cuny4palestine/p/DHD87JOuq04/?img_index=1 (Mar. 11, 2025).

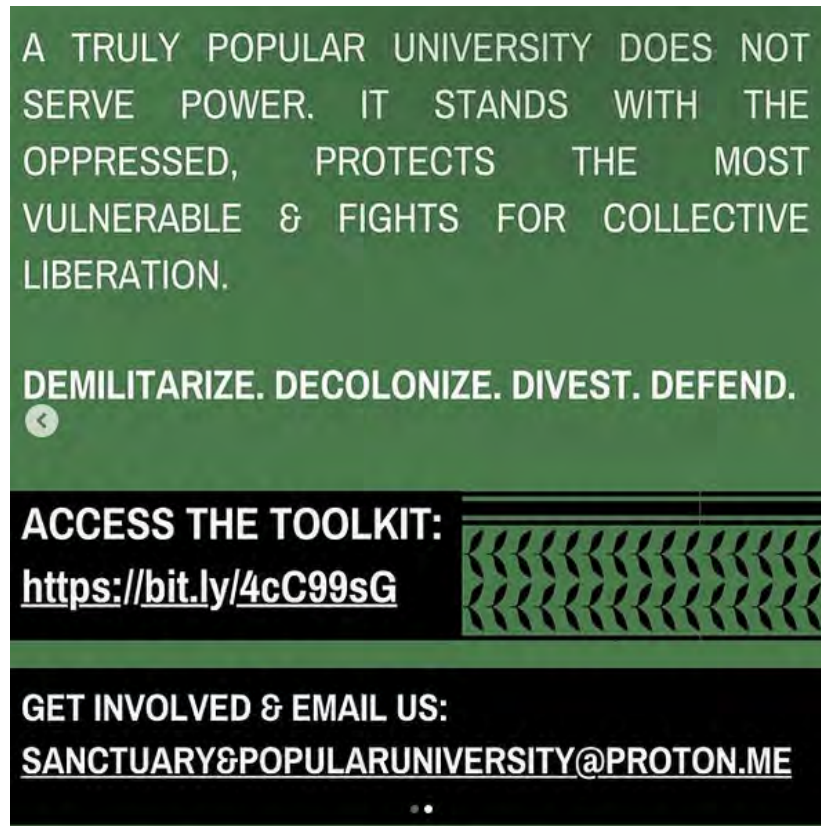
³⁴⁴ CUNY for Palestine (@cuny4palestine), Instagram, https://www.instagram.com/cuny4palestine/p/DIeLrjrue0i/?img_index=1 (Apr. 15, 2025).

disrupt their schools with unlawful protest actions and to interfere with and obstruct immigration law enforcement in service of AMP and NSJP's mission of assisting Hamas.³⁴⁵ As with the mutual defense pledge,³⁴⁶ CUNY for Palestine served NSJP directly by operating in the role of a facilitator, creating a new email address so it could serve as a coordinator for individuals and organizations seeking to be involved in AMP and NSJP's new project for interfering with law enforcement and pressuring schools into compliance with AMP and NSJP's demands.



³⁴⁵ Toolkit attached as Exhibit F.

³⁴⁶ See *supra* ¶ 101.



302. On April 17, 2025, NSJP commemorated the one-year anniversary of the first Columbia encampment’s creation, valorizing how it “sparked a nationwide and worldwide escalation, aptly named the Student intifada.”³⁴⁷ NSJP announced, “Today, we declare: the Student Intifada is far from over. ... Long live the Student Intifada, long live the Popular University, and long live the unbreakable people of Gaza.” On information and belief, AMP and NSJP intended this post to foreshadow the relaunch of their encampment operation at Yale on April 22, 2025.³⁴⁸

³⁴⁷ National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/nationalsjp/p/DIjUqzgsTGK/> (Apr. 17, 2025).

³⁴⁸ See *infra* ¶ 338.



303. On April 21, 2025, NSJP joined its pro-Hamas collaborators in ordering protestors to mobilize to Columbia campus to support and defend protestors from NSJP's Columbia chapters and affiliates who had chained themselves to the gates at the entrance to Columbia's campus in protest against Mahmoud Khalil's deportation.³⁴⁹

³⁴⁹ Writers Against the War on Gaza (@wawog_now), Instagram, https://www.instagram.com/wawog_now/p/Dltyy3AJvzT/?img_index=1 (Apr. 21, 2025).



C. AMP and NSJP also continued to encourage violent, disruptive protests and encampments by NSJP's other chapters and affiliates after the riots on April 30, 2024.

304. Alongside AMP and NSJP's defense of and extensive involvement with NSJP's CUNY and Columbia chapters and affiliates following the riots at CUNY and Columbia on April 30, 2024, AMP and NSJP further demonstrated their approval, support, encouragement, and direct involvement in NSJP's chapters and affiliates' violent lawlessness by supporting and condoning such conduct by many of NSJP's other chapters and affiliates. Leading up to and following the riots of April 30th, AMP and NSJP continued to direct, support, promote, and encourage the creation of unlawful encampments on campuses and NSJP's chapters and affiliates' violent

“defense” of them. At no point did AMP and NSJP disavow, disapprove of, or distance itself from any of this violent, illegal conduct by NSJP’s chapters and affiliates, no matter how severe it was.

305. AMP and NSJP continued to mobilize and direct mass actions by NSJP’s chapters and affiliates across the United States and Canada to take over and physically disrupt their campuses, violently resist law enforcement, and demand charges against their violent members be dropped, including NSJP’s chapters and affiliates at George Washington,³⁵⁰ University of Texas Dallas,³⁵¹ Yale,³⁵² Portland State University,³⁵³ The New School,³⁵⁴ New York University,³⁵⁵ UCLA,³⁵⁶ UC Irvine,³⁵⁷ Rhode Island School of Design,³⁵⁸ University of Chicago,³⁵⁹ University

³⁵⁰ PYM DMV (@dmvpym), Instagram, <https://www.instagram.com/dmvpym/p/C6cLGx8yP8L/> (May 1, 2024).

³⁵¹ Students for Justice in Palestine (@sjputd), Instagram, <https://www.instagram.com/sjputd/reel/C6cm-WJ6MT/> (May 1, 2024); Students for Justice in Palestine (@sjputd), Instagram, <https://www.instagram.com/sjputd/reel/C6ewVBGpHa1/> (May 2, 2024).

³⁵² c <https://www.instagram.com/yalies4palestine/p/C6dQTmau1r6/> (May 2, 2024); American Muslims for Palestine: Connecticut Chapter (@ampalestinect), Instagram, <https://www.instagram.com/ampalestinect/reel/C6d10EGrsvD/> (May 2, 2024); Yalies4Palestine (@yalies4palestine), Instagram, <https://www.instagram.com/yalies4palestine/reel/C6eihqyvzGk/> (May 2, 2024).

³⁵³ PSU Students United for Palestinian Equal Rights (@psu_super), Instagram, https://www.instagram.com/psu_super/p/C6en1qLyNbW/?img_index=1 (May 2, 2024).

³⁵⁴ New School Students for Justice in Palestine (@tns.sjp), Instagram, https://www.instagram.com/tns.sjp/p/C6epmfZOW-M/?img_index=1 (May 2, 2024); New School Students for Justice in Palestine (@tns.sjp), Instagram, https://www.instagram.com/tns.sjp/p/C6fAcPIMBCL/?img_index=1 (May 2, 2024); New School Students for Justice in Palestine (@tns.sjp), Instagram, https://www.instagram.com/tns.sjp/p/C6gWIEVuOzo/?img_index=1 (May 3, 2024); New School Students for Justice in Palestine (@tns.sjp), Instagram, https://www.instagram.com/tns.sjp/p/C6geLCJuNbN/?img_index=1 (May 3, 2024); New School Students for Justice in Palestine (@tns.sjp), Instagram, https://www.instagram.com/tns.sjp/p/C6g4u-4uwNn/?img_index=1 (May 3, 2024); New School Students for Justice in Palestine (@tns.sjp), Instagram, <https://www.instagram.com/tns.sjp/p/C69riURuMT3/> (May 14, 2024).

³⁵⁵ NYU LSJP (@nyulsjp), Instagram, https://www.instagram.com/nyulsjp/p/C6gYUpduExc/?img_index=1 (May 3, 2024); NYU-FSJP (@nyu_fsjp), Instagram, https://www.instagram.com/nyu_fsjp/reel/C6ge5_VOIYI/ (May 3, 2024).

³⁵⁶ SJP at UCLA (@sjpatucla), Instagram, https://www.instagram.com/sjpatucla/p/C6bDyoiL_AA/ (May 1, 2024); SJP at UCLA (@sjpatucla), Instagram, <https://www.instagram.com/sjpatucla/p/C6oQxFuLzFG/> (May 6, 2024).

³⁵⁷ UC Divest Coalition at UCI (@ucdivest), Instagram, <https://www.instagram.com/ucdivest/p/C69LwmmJf1J/> (May 14, 2024).

³⁵⁸ RSJP (@risdsjp), Instagram, <https://www.instagram.com/risdsjp/p/C6r4MkLs8BK/> (May 7, 2024); RSJP (@risdsjp), Instagram, <https://www.instagram.com/p/C6wRWmKOWPr/> (May 9, 2024).

³⁵⁹ Jjsoorusa (jisoor), Instagram, <https://www.instagram.com/jjsoorusa/p/C6qndkOrkbb/> (May 7, 2024); UChicago United for Palestine (@uchicagounited), Instagram, <https://www.instagram.com/uchicagounited/reel/C6rprEXPXUi/> (May 7, 2024); UChicago United for Palestine (@uchicagounited), Instagram, https://www.instagram.com/uchicagounited/p/DBHM0sRvG6k/?img_index=1 (Oct. 14, 2024).

of North Carolina,³⁶⁰ University of Pennsylvania,³⁶¹ McGill University,³⁶² Pomona College,³⁶³ Fordham University,³⁶⁴ University of South Florida,³⁶⁵ Bowdoin College,³⁶⁶ and in public spaces in Washington, D.C.³⁶⁷

306. On May 1, 2024, in the immediate aftermath of the violent riots by NSJP's chapters at CUNY and Columbia, NSJP joined its pro-Hamas collaborators and its SoCal chapters in issuing a mass call to "SHOW UP TO THE ENCAMPMENTS," targeting not just students at campuses but outside activists as well, declaring, "WE ARE ALL SJP!"³⁶⁸ NSJP also joined its pro-Hamas collaborators in publishing a video highlights reel of violence and disruption at riots by NSJP's chapters and affiliates during which they violently "defended" their encampments against police. The video specifically emphasized clips of students striking police officers in the head, and clips from the riots perpetrated by NSJP's CUNY and Columbia chapters and affiliates, with a recording of Mumia Abu-Jamal's call to the CUNY encampment on April 26, 2024,³⁶⁹ overlaid over the

³⁶⁰ UNC GSLP: Graduate Students for the Liberation of Palestine (@uncgslp), Instagram, https://www.instagram.com/uncgslp/p/C6rteDmv148/?img_index=3 (May 7, 2024).

³⁶¹ (u)PAO (@up.against.the.occupation), Instagram, <https://www.instagram.com/up.against.the.occupation/reel/C6yLDn8uTRy/> (May 10, 2024); The Philly Palestine Coalition (@phillypalestinecoalition), Instagram, https://www.instagram.com/phillypalestinecoalition/p/C6yXGNzOOLn/?img_index=1 (May 10, 2024).

³⁶² SPHR McGill (@sphrmcgill), Instagram, https://www.instagram.com/sphrmcgill/p/C74zxZ7vKrl/?img_index=1 (June 6, 2024).

³⁶³ Undercurrents (@claremont.undercurrents), Instagram, https://www.instagram.com/claremont.undercurrents/p/DA_kk_NSN-1/?img_index=1 (Oct. 11, 2024).

³⁶⁴ Fordham SJP (@fordhamsjp), Instagram, https://www.instagram.com/fordhamsjp/p/C6bQGHYO62K/?img_index=1 (May 1, 2024).

³⁶⁵ USF Divest Coalition (@usfdivestcoalition), Instagram, https://www.instagram.com/usfdivestcoalition/p/C6bjlOpLH4U/?img_index=2 (May 1, 2024); USF Divest Coalition (@usfdivestcoalition), Instagram, <https://www.instagram.com/usfdivestcoalition/reel/C6buzgdxNNn/> (May 1, 2024).

³⁶⁶ Bowdoin Students For Justice in Palestine (@bowdoinsjp), Instagram, https://www.instagram.com/p/DFv9IH8Mkkx/?img_index=1 (Feb. 6, 2025).

³⁶⁷ DMV SJP Coalition (@dmvsjp), Instagram, <https://www.instagram.com/dmvsjp/reel/C7-XAecxmVB/> (June 8, 2024);

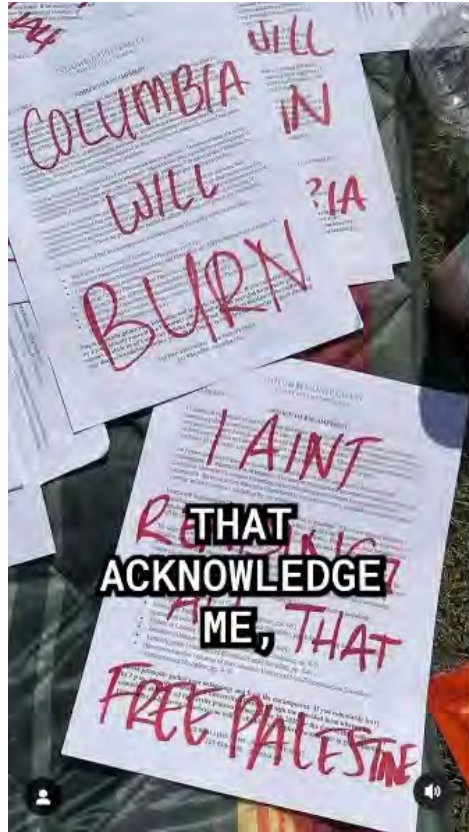
³⁶⁸ PYM LA-OC-IE (@pymlaocie), Instagram, <https://www.instagram.com/pymlaocie/p/C6ab4ZFOZE/> (May 1, 2024).

³⁶⁹ See *supra* ¶ 233.

footage.³⁷⁰ On information and belief, this recording of Abu-Jamal's call was either recorded by NSJP at the encampment or was directly shared between NSJP and its CUNY chapters and affiliates as part of their close cooperation on the CUNY encampment.



³⁷⁰ Writers Against the War on Gaza (@wawog_now), Instagram, <https://www.instagram.com/p/C6boW-muVdW/?hl=en> (May 1, 2024).



wawog_now and 5 others
Original audio

wawog_now SEIZE THE MOMENT THAT THE STUDENTS IGNITED. Over the past week, the student movement has shown us all what solidarity looks like: putting bodies on the line; being uncompromising in our demands; trading certain futures for the promise of liberation. University administrators have responded to this bravery by unleashing the state's feral dogs. Last night, the pigs brutalized protesters at Columbia University and City College, subjecting them to mace, drawing weapons on them, and pushing them down concrete stairs. At UCLA, the LAPD stood watching as a Zionist mob assaulted protesters for hours. Still, the students held their ground.

The struggle rages on. For every



45,171 likes

May 1, 2024

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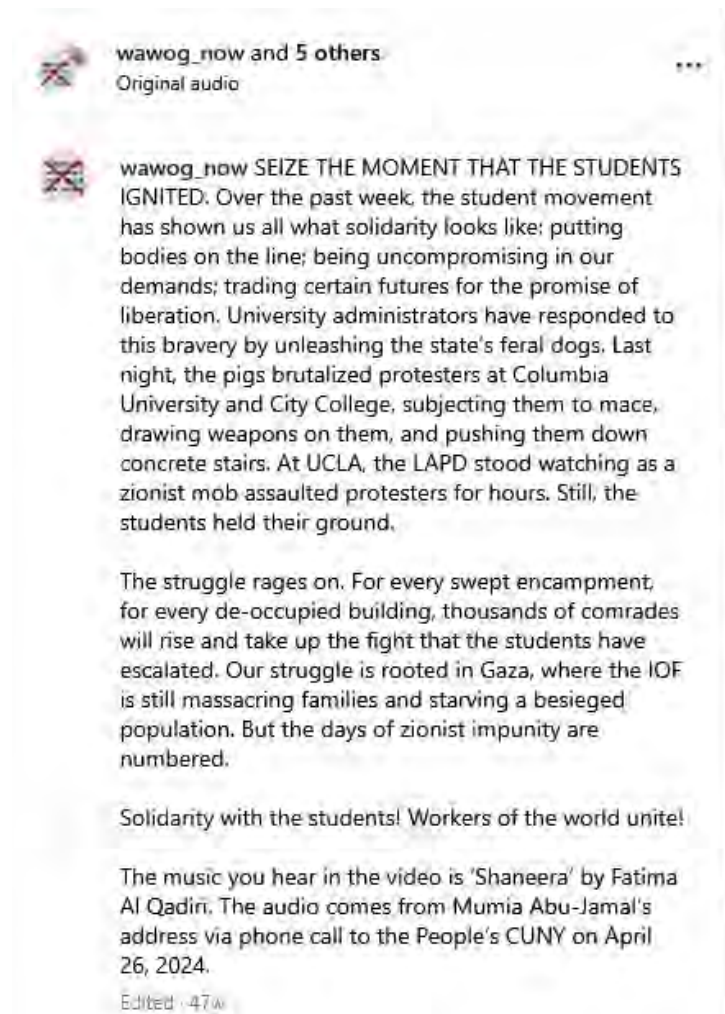
The struggle rages on. For every



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307. On May 3, 2024, NSJP proudly updated the reach of its Popular University project with a map of “Campuses in Revolt” across the United States and Canda, boasting that it had organized “OVER 150 PROTESTS, OCCUPATIONS, POPULAR UNIVERSITIES & ENCAMPMENTS IN 2 WEEKS,” and threatening that its movement was “only growing, growing, growing.”³⁷¹ NSJP also joined with its pro-Hamas collaborators and its chapter at The New School in declaring that “the student intifada lives on.”³⁷²

³⁷¹ National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/nationalsjp/p/C6g9fE1uty2/?img_index=1 (May 3, 2024).

³⁷² PYM NYC (@nycpym), Instagram, <https://www.instagram.com/nycpym/reel/C6hnJI8MiJD/> (May 3, 2024).

308. NSJP sought to continue the momentum of its Popular University project and prepare its chapters and affiliates for their next operation on campuses, announcing the creation of its “National SJP Summer School” program to “invite[] student organizers and movement partners to deepen our understanding of our current political moment and develop our organizational and leadership skills, with the aim of entrenching the frameworks necessary to sustain and grow the Student Intifada in the coming academic year.”³⁷³ NSJP’s post announcing this program ominously stated, “Who is the Revolution? We are the Revolution.”

309. Demonstrating that the violence associated with AMP and NSJP’s encampment operation was in service of their goal of aiding Hamas, Hamas senior leader Khaled Mashal—founder of AMP’s predecessor organization IAP—praised the student movement AMP and NSJP have been leading since the October 7th attack in a May 18, 2024, address to the “Flood of the Free” conference hosted by the terrorist organization Muslim Brotherhood. Mashal followed up his praise with direct orders for AMP and NSJP’s student movement to engage in further efforts to protest against Israel and its American supporters, dominate media with Hamas’s narrative, and engage in physical “Jihad:”

We thank the great student Flood, which emerged from the American, European, and Western universities, and has reached all the countries of our nation. ...We have the opportunity to defeat Israel, Allah willing. We have an opportunity to dismantle the Zionist enterprise. We have an opportunity to change the world, and to make Palestine a blessing to Mankind, by annihilating the Zionists and their sinful enterprise.

Three major steps are required from you.

The first step is to continue what you started immediately following October 7. The activities and the programs that you have held throughout the past 8 months – you should continue them. ... Continue your financial Jihad. We want a continuous

³⁷³ National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/nationalsjp/p/C8H1Fp4uuWJ/> (June 12, 2024).

financial Flood, in support of Gaza, to provide the people shelter, aid, and food, in support of the mujahideen, and in order to buy weapons for them.

We want a Flood of the public, we want the millions to return to the streets. We want the masses of our nation to remain in the streets, in support of the war in Gaza, Jerusalem, and the West Bank. They should declare their rage against the Zionists and their supporters.

We want a flood in the form of a siege of the Israeli and American embassies. We want constant rage that will stop this aggression. We want a media Flood that will deliver its message. We want the truthful Palestinian narrative to reach far and to control all social media platforms and all forums. We want a legal Flood, like in the Hague. We should prosecute the criminal killers. We stand by South Africa and the countries that have now joined it – Turkey, Libya, and Egypt.

The second step is that we want to become involved in the battle of Jihad and resistance. Today, we have a greater duty to do more than all we have done before. Indeed, on several fronts, there is blessed participation in the Jihad, and we are grateful to the people behind it. We want total integration in the battle on the ground. Today, we want a Flood of Jihad and resistance. Being far away does not absolve us from the duty of Jihad and resistance. This is a great honor. When the Muslims recaptured Palestine, Jerusalem and the Al-Aqsa Mosque from the Crusaders, this duty was not shouldered only by the people of Palestine or the Levant. The entire nation came under the banner of Saladin. Today, the Islamic nation is obligated to join this blessed Jihadi Flood. When it does, we will see wonders.

...By Allah, the Al-Aqsa Flood war is good for all of you. It is good for the Arabs, the Muslims, your countries, your security, and stability.

It is good for Mankind, because annihilating the Zionists is good for humanity as a whole.³⁷⁴

310. Tellingly, Mashal repeatedly referred to the various operations and endeavors he called for as “Floods” in the same manner that AMP, NSJP, and their pro-Hamas collaborators use “Flood” when referring to their protest operations.³⁷⁵

311. In addition to its violent encampments, AMP and NSJP continued to order their chapters to engage in scheduled protest actions.

³⁷⁴ MEMRI, *supra* note 36.

³⁷⁵ See *supra* ¶¶ 65, 275, 278, 288, 309.

312. On September 2, 2024, NSJP announced a “Day of Action” on September 12, 2024, threatening that “the student intifada continues.”³⁷⁶

313. NSJP also continued with its direct training and resource programs, announcing on September 3, 2024, that it was running an 8 session “divestment bootcamp” to teach its chapters and affiliates “tips & strategies for each stage of your divestment campaign.”³⁷⁷ The violent, illegal, and disruptive encampments and protest actions by NSJP’s chapters are a major component of the divestment campaign NSJP was teaching and directing its chapters to conduct.

314. As part of its service to Hamas, AMP and NSJP organized and mobilized NSJP’s chapters and affiliates to celebrate the one-year anniversary of the October 7th massacre with an “International Day of Action” commemorating “one year of resistance.”³⁷⁸

³⁷⁶ National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/nationalsjp/p/C_a34KIPF9n/ (Sep. 2, 2024).

³⁷⁷ National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/nationalsjp/p/C_dzK79x1Hw/ (Sep. 3, 2024).

³⁷⁸ Palestinian Youth Movement (@palestinianyouthmovement), Instagram, https://www.instagram.com/palestinianyouthmovement/p/C_WyxfOgA8t/?img_index=2 (Aug. 31, 2024); The People’s Forum (@peoplesforumnyc), Instagram, <https://www.instagram.com/peoplesforumnyc/p/DAtRmKzOff8/> (Oct. 4, 2024).



315. NSJP also declared a “global Week of Rage” for “students around the world [to] rise together for Gaza, for Lebanon, and for all the masses fighting against Zionist colonization and Western imperialism,” declaring “Glory to our martyrs and long live the student intifada.”³⁷⁹

316. On November 19, 2024, NSJP published an article in “The Written Resistance” titled, “The Campus as a Battleground—Continuing the Student Intifada.”³⁸⁰ The article described how NSJP’s Popular University project was a strategic operation intended to cultivate and advance a popular movement for overthrowing Western capitalism in accord with Marxist theory and that NSJP’s new plan was to use “the momentum from the Student Intifada ... to carry out sustained

³⁷⁹ National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/nationalsjp/reel/DzPGFVsXUC/> (Oct. 6, 2024).

³⁸⁰ The Written Resistance (@thewrittenresistance), Instagram, https://www.instagram.com/thewrittenresistance/p/DCKSOyQv2ny/?img_index=1 (Nov. 19, 2024).

disruptions, strategic actions, and strikes, leveraging all forms of student power and labor to remain in our offensive posture and forcing our universities to act.” NSJP proudly declared, “Let the Student Movement stand as a beacon of resistance, signaling the beginning of the complete upheaval of the forces that maintain injustice.”

317. On December 31, 2024, NSJP posted its “2024 National SJP Year in Review,” proudly taking credit for “a year of unprecedented SJP organizing for Palestinian Liberation,” declaring that it had organized its chapters and affiliates as “1 United Student Movement” with “407 Active Chapters,” “127 Popular Universities [i.e., encampments] Established,” “56 Divestment Resolutions Passed,” “90,000 Students Strik[ing] in Montreal,” “3,000+ Students & Faculty Arrested,” “11 Presidents Resign[ing],” and “1,000,000+ Students Mobilized for Gaza,” threatening that in “2025 The Struggle Continues.”³⁸¹

318. On January 16, 2025, NSJP declared a “Day of Action” for its chapters and affiliates on January 21, 2025, to agitate for university divestment from Israel in support of Hamas.³⁸²

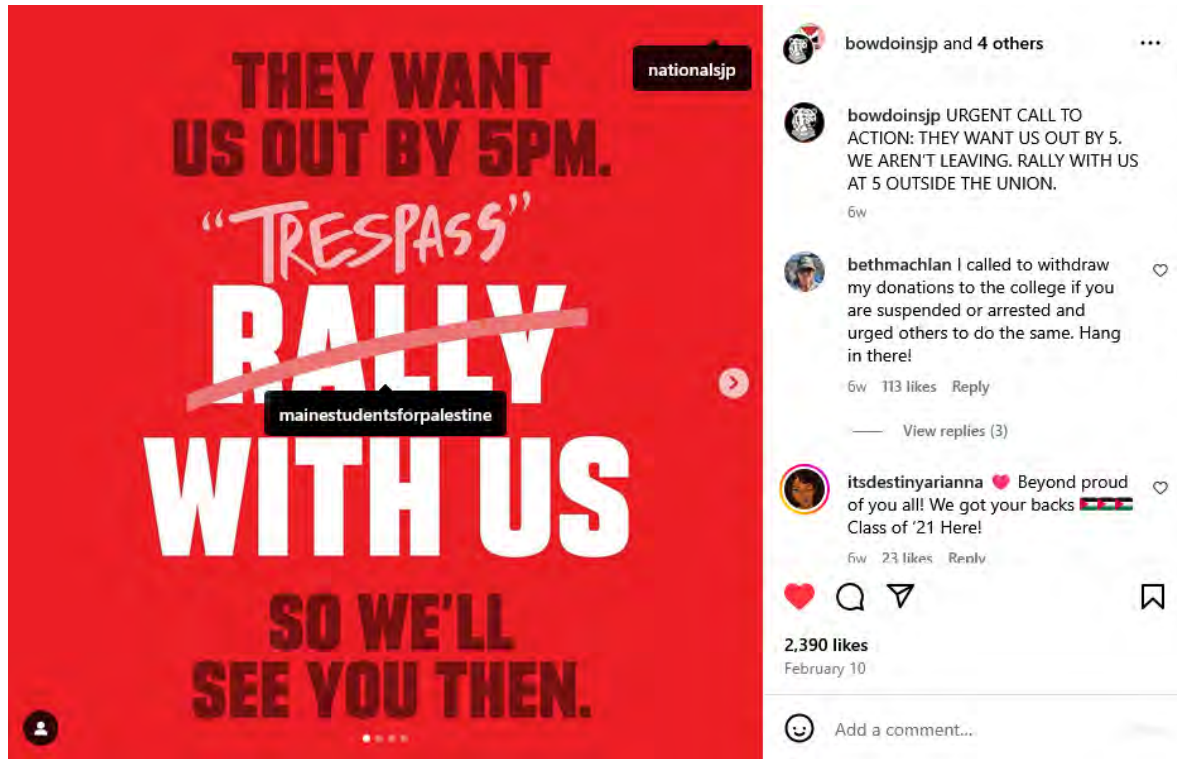
319. On February 8, 2025, NSJP published a guide on what to do “If an Agent Knocks,” instructing its chapters and affiliates in “best practices” for how to be evasive and uncooperative with law enforcement in service of the “resistance.”³⁸³

³⁸¹ National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/nationalsjp/p/DEQaj_5SSnO/?img_index=1 (Dec. 31, 2024).

³⁸² National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/nationalsjp/p/DE5kZF_v0Lu/ (Jan. 16, 2025).

³⁸³ National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/p/DF0y6AxSLkL/?img_index=1 (February 8, 2025).

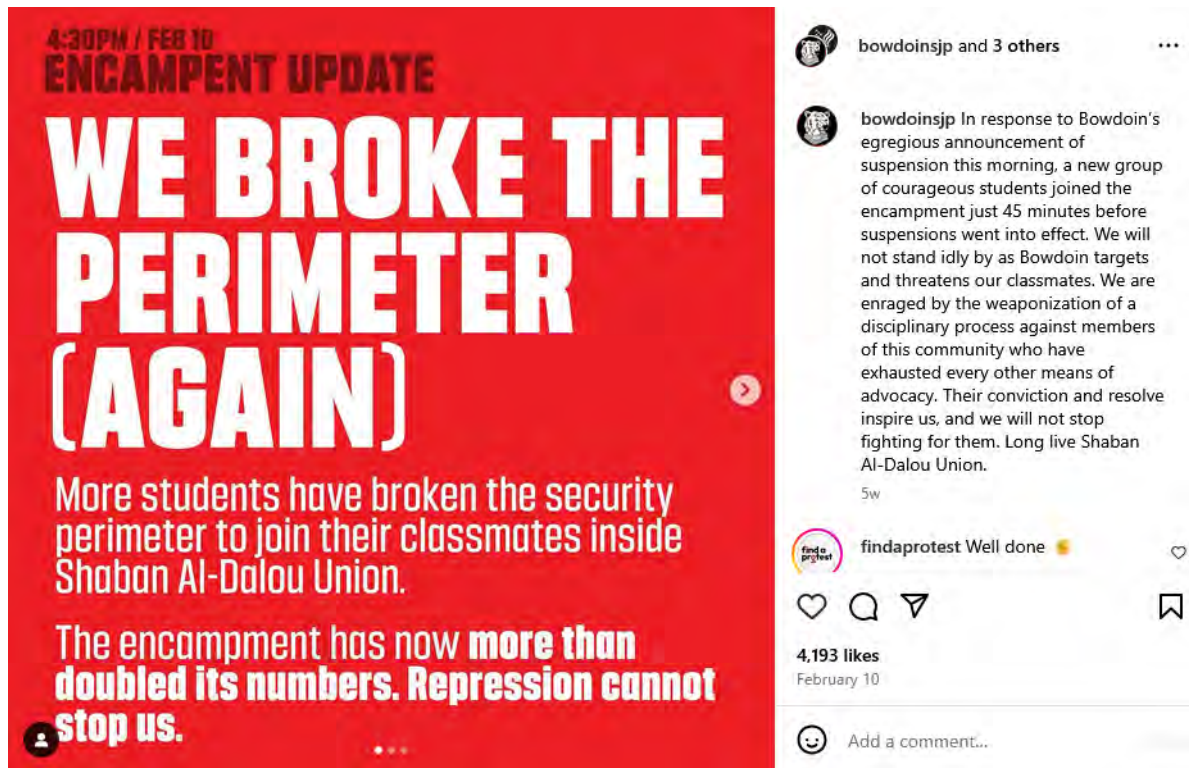
320. On February 10, 2025, NSJP joined its Bowdoin College chapter in directly ordering its members to violate the law by illegally trespassing in Bowdoin's student union building.³⁸⁴



321. NSJP then joined its Bowdoin chapter in proudly announcing its protestors' breach of the law enforcement perimeter surrounding the chapter's encampment in support of its illegal activity.³⁸⁵

³⁸⁴ Bowdoin Students For Justice in Palestine (@bowdoinsjp), Instagram, https://www.instagram.com/p/DF5rtvnxeHQ/?img_index=1 (Feb. 10, 2025).

³⁸⁵ Bowdoin Students For Justice in Palestine (@bowdoinsjp), Instagram, https://www.instagram.com/bowdoinsjp/p/DF6JtICR0VD/?img_index=1 (Feb. 10, 2025).



322. On February 25, 2025, NSJP joined its pro-Hamas collaborators in valorizing the self-immolation of a mentally ill man who committed suicide as a protest outside of the Israeli embassy, declaring it an act of power and bravery.³⁸⁶

323. Following the arrest and deportation proceedings against CUAD leader and proud Hamas supporter Mahmoud Khalil, NSJP engaged in a campaign to mobilize its chapters and affiliates to protest, march, and disrupt against his deportation.

³⁸⁶ Writers Against the War on Gaza (@wawog_now), Instagram, <https://www.instagram.com/p/DGgU1IWvwQ-/> (Feb. 25, 2025).

324. NSJP organized coalitions of its chapters in Texas,³⁸⁷ the Midwest,³⁸⁸ Louisiana,³⁸⁹ Southern California,³⁹⁰ Canda,³⁹¹ in releasing statements and organizing protests against Khalil’s arrest.

325. NSJP also directed its chapters and affiliates to rally on March 12, 2025, outside the courthouse in Foley Square in New York City as part of the “Shut It Down! For Palestine” protest campaign to agitate for Khalil’s release.³⁹²

326. On March 16, 2025, NSJP declared its defiance of the law and university disciplinary rules, stating that no consequences for its chapters and affiliates would “dampen our resolve” and that “nothing will hinder our movement because our cause is just.”³⁹³ NSJP called for its chapters and affiliates to engage in a “Week of Rage” from March 31 to April 4, 2025, against their schools and law enforcement to show that “THE STUDENT MOVEMENT IS UNBREAKABLE!”

³⁸⁷ Palestine Solidarity Committee at University of Texas, Austin (@psc_atx), Instagram, https://www.instagram.com/p/DHEd492JYaf/?img_index=1 (Mar. 11, 2025); Students for Justice in Palestine at University of Texas, Dallas (@sjputd), Instagram, <https://www.instagram.com/p/DHEsOpfphP4/> (Mar. 11, 2025).

³⁸⁸ SJP OSU (@sjposu), Instagram, https://www.instagram.com/p/DHEuV4Eywc5/?img_index=1 (Mar. 11, 2025).

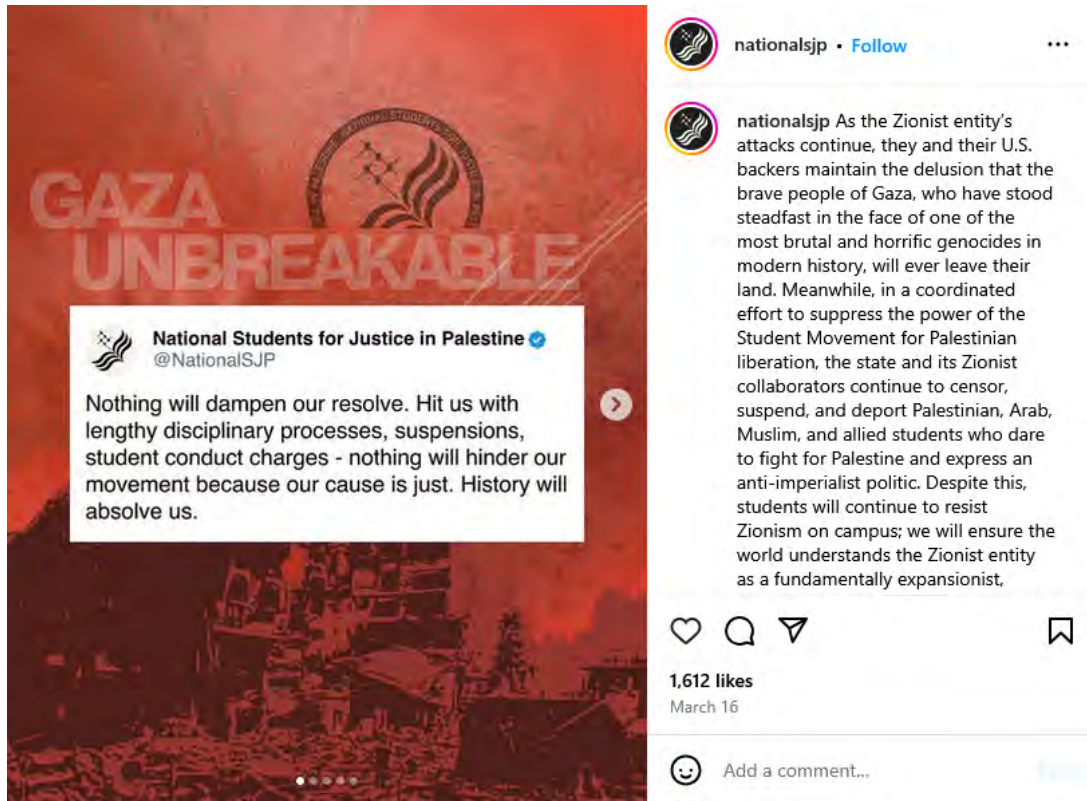
³⁸⁹ SJP at LSU (@sjpatlsu), Instagram, https://www.instagram.com/p/DHHeM1SPsiz/?img_index=1 (Mar. 12, 2025).

³⁹⁰ SoCal SJP (@socalsjp), Instagram, https://www.instagram.com/p/DHHhfZZSRWJ/?img_index=1 (Mar. 12, 2025).

³⁹¹ SPHR McGill (@sphrmcgill), Instagram, https://www.instagram.com/p/DHJGoEjRCch/?img_index=1 (Mar. 13, 2025).

³⁹² National Students for Justice in Palestine (@nationalsjp), Instagram, <https://www.instagram.com/p/DHE-dmyMpJw/> (Mar. 11, 2025); PYM NYC (@nycpym), Instagram, https://www.instagram.com/p/DHGtu2UNk5o/?img_index=1 (Mar. 12, 2025).

³⁹³ National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/p/DHRP4_ZJr9X/?img_index=1 (Mar. 16, 2025).



327. On March 18, 2025, NSJP continued issuing its orders for its chapters and affiliates to engage in a “Week of Rage,” stating, “We call for continuous actions across university campuses.”³⁹⁴

328. On March 21, 2025, NSJP organized a statewide rally for its chapters and affiliates across Kentucky to rally in favor of releasing Mahmoud Khalil and “all Palestinians in Israeli Jails.”³⁹⁵

329. On March 24, 2025, NSJP declared that all universities that do not bow to its demands to divest from Israel and side with Hamas in its genocidal war on Israel are “guilty” and “complicit” in the “ongoing genocide of the Palestinian people” and serve as “the architects and participants in the machinery of genocide perpetuated by the US Empire and Zionist Entity.”³⁹⁶ NSJP warned that “they will be judged.”³⁹⁷

330. Leading up to NSJP’s planned “Week of Rage,” NSJP directly assisted multiple of its chapters and affiliates with planning and promoting their planned protests and disruptions, including at Cleveland State University,³⁹⁸ Oklahoma University,³⁹⁹ University of New

³⁹⁴ National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/nationalsjp/p/DHW1Imevmhx/?img_index=1 (Mar. 18, 2025).

³⁹⁵ Students for Justice at UKY (@sjpuky), Instagram, https://www.instagram.com/p/DHeFvyQP9L2/?img_index=1 (Mar. 21, 2025).

³⁹⁶ National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/p/DHmBD-Ry_dY/ (Mar. 24, 2025).

³⁹⁷ *Id.*

³⁹⁸ CSU’s Students for Justice in Palestine (@csusjp), Instagram, https://www.instagram.com/p/DHlawTdgaCr/?img_index=1 (Mar. 24, 2025).

³⁹⁹ OU Students for Justice in Palestine (@ou.sjp), Instagram, https://www.instagram.com/p/DHq9OC7RA9K/?img_index=1 (Mar. 26, 2025).

Hampshire,⁴⁰⁰ Swarthmore College,⁴⁰¹ Binghamton University,⁴⁰² Ball State University,⁴⁰³ University of Toronto,⁴⁰⁴ University of Albany,⁴⁰⁵ Universities across San Francisco,⁴⁰⁶ The New School,⁴⁰⁷ Universities across New York City (organized in direct partnership with CUNY for Palestine),⁴⁰⁸ University of Central Florida,⁴⁰⁹ CUNY Law School,⁴¹⁰ Hunter College,⁴¹¹ and Ohio State University.⁴¹²

331. On April 21, 2025, NSJP issued orders to its chapters, affiliates, and allies to rise up on May Day (May 1, 2025) and engage in “Intifada Until Liberation!” NSJP’s announcement directed its chapters and affiliates to obstruct law enforcement and drive its enemies off campuses:

⁴⁰⁰ Palestine Solidarity Coalition UNH (@psc_unh), Instagram, https://www.instagram.com/psc_unh/p/DHwtDbRs0qi/?img_index=1 (Mar. 28, 2025).

⁴⁰¹ Swarthmore SJP (@swarthmoresjp), Instagram, https://www.instagram.com/swarthmoresjp/p/DHxF_cM0RU/?img_index=1 (Mar. 28, 2025); Swarthmore SJP (@swarthmoresjp), Instagram, <https://www.instagram.com/swarthmoresjp/p/DH9GBAfy2gE/> (Apr. 2, 2025).

⁴⁰² SJP Binghamton (@sjpbinghamton), Instagram, https://www.instagram.com/sjpbinghamton/p/DHyeDYIuKXa/?img_index=1 (Mar. 29, 2025).

⁴⁰³ Ball State for Palestine (@bsu4palestine), Instagram, https://www.instagram.com/bsu4palestine/p/DHyei1gAx4k/?img_index=1 (Mar. 29, 2025).

⁴⁰⁴ UofT Occupy for Palestine (@occupyuoft), Instagram, https://www.instagram.com/occupyuoft/p/DHylJZuRayQ/?img_index=1 (Mar. 29, 2025).

⁴⁰⁵ UAlbany Students for Justice in Palestine (@ualbanysjp), Instagram, https://www.instagram.com/ualbanysjp/p/DHy7-bcP1qZ/?img_index=1 (Mar. 29, 2025).

⁴⁰⁶ USFCA Students for Palestine (@usfcastudents4palestine), Instagram, https://www.instagram.com/usfcastudents4palestine/p/DH5BCaAOvzD/?img_index=1 (Apr. 1, 2025).

⁴⁰⁷ New School Students for Justice in Palestine (@tns.sjp), Instagram, <https://www.instagram.com/tns.sjp/p/DH8gxroxZSW/> (Apr. 2, 2025).

⁴⁰⁸ National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/nationalsjp/p/DH8uH_7u92d/ (Apr. 2, 2025); National Students for Justice in Palestine (@nationalsjp), Instagram, https://www.instagram.com/nationalsjp/p/DH_DJ79uQ61/?img_index=1 (Apr. 3, 2025); CUNY for Palestine (@cuny4palestine), Instagram, <https://www.instagram.com/cuny4palestine/p/DIAJMN4sU3d/> (Apr. 3, 2025).

⁴⁰⁹ Knights Against Genocide Coalition (@knightsagainstgenocide), Instagram, <https://www.instagram.com/knightsagainstgenocide/p/DH86tWhpBS8/> (Apr. 2, 2025).

⁴¹⁰ CUNY Law SJP (@cunylawsjp), Instagram, https://www.instagram.com/cunylawsjp/p/DH9g2Mppt3b/?img_index=1 (Apr. 2, 2025).

⁴¹¹ Hunter YSDA (@hunter_ydsa), Instagram, https://www.instagram.com/hunter_ydsa/p/DH-3lyOxY3d/ (Apr. 3, 2025).

⁴¹² SJP OSU (@sjposu), Instagram, https://www.instagram.com/sjposu/p/DH_aLAAu2Fe/?img_index=1 (Apr. 3, 2025).



332. On April 22, 2025, NSJP joined its chapter at Bowdoin—which it assisted in illegal trespassing and obstructing law enforcement at recent protests⁴¹³—in objecting to an investigation into the chapter for antisemitic harassment it had perpetrated at its disruptive and unlawful protests.⁴¹⁴

D. AMP and NSJP recently relaunched their encampment operation, directly supporting and fomenting a new wave of campus encampments, including at CUNY.

333. AMP and NSJP recently reconfirmed their intent and direct support for their chapters and affiliates to engage in violence and illegality in service of their pro-Hamas mission.

⁴¹³ See *supra* ¶¶ 320–21.

⁴¹⁴ Bowdoin Students for Justice in Palestine (@bowdoinsjp), Instagram, https://www.instagram.com/bowdoinsjp/p/DIxP9bHx_1/?img_index=2 (Apr. 22, 2025).

Over the last several days, AMP and NSJP directly involved themselves in the creation of a new encampment and waves of violent, antisemitic protests at Yale—in a manner similar to their use of the first encampment at Columbia as a vanguard for violent, unlawful, antisemitic encampments by NSJP’s chapters and affiliates across the country.

334. On April 22, 2025, AMP and NSJP joined their chapters and affiliates in announcing the “relaunch” of the encampment at Yale, declaring that “the resistance is back—louder, stronger, and more relentless than ever,” and ordering protestors to mobilize to the encampment immediately.⁴¹⁵ NSJP then joined its chapters and affiliates at Yale in publishing a video from the encampment.⁴¹⁶ The stated purpose of the encampment protest was to oppose and prevent a lecture from being delivered by Israeli Minister Itamar Ben-Gvir.

335. The AMP and NSJP protestors who created the encampment used force and intimidation to accost Jewish students on Yale’s campus, restricting and denying their access to the campus area they had taken over, shining lights in their faces while interrogating them about whether they were Jewish, Israeli, or “Zionists” and insulting them based on race, national origin, and religion.⁴¹⁷ The protestors were also led in mass chants of Hamas slogans, declaring, “We will honor all our martyrs!”⁴¹⁸

⁴¹⁵ American Muslims for Palestine: Connecticut (@ampalestinect), Instagram, <https://www.instagram.com/ampalestinect/reel/DIxSevWMarG/> (Apr. 22, 2025).

⁴¹⁶ Yalies 4 Palestine (@yalies4palestine), Instagram, <https://www.instagram.com/yalies4palestine/reel/DIxU003MrpJ/> (Apr. 22, 2025).

⁴¹⁷ @KassyAkiva, Twitter (Apr. 22, 2025 10:51 PM), <https://x.com/KassyAkiva/status/1914874849496867287>; @sahar_tartak, Twitter (Apr. 22, 2025 11:32 PM), https://x.com/sahar_tartak/status/1914885022995095678; @NetanelCrispe, Twitter (Apr. 23, 2025 12:11 AM), <https://x.com/NetanelCrispe/status/1914894914246336682>; @NetanelCrispe, Twitter (Apr. 23, 2025 1:59 AM), <https://x.com/NetanelCrispe/status/1914922140987494785>.

⁴¹⁸ @KassyAkiva, Twitter (Apr. 23, 2025 8:08 AM), <https://x.com/KassyAkiva/status/1915014866785493396>.

336. CUNY for Palestine joined AMP and NSJP in supporting the new encampment operation at Yale, issuing a call alongside AMP and NSJP's pro-Hamas collaborators for reinforcements to mobilize to the Yale encampment.⁴¹⁹

337. The protestors temporarily dismantled their encampment as a tactical decision in preparation for further escalation the following day.⁴²⁰ In response to the antisemitic harassment and unlawful conduct that AMP and NSJP had organized with their Yale chapters and affiliates, Yale stripped NSJP's Yale chapter, Yales4Palestine, of its recognition as a student group, stating that the group had "flagrantly violated the rules to which the Yale College Dean's Office holds all registered student organizations" and that "[c]oncerns have been raised about disturbing antisemitic conduct at the gathering."⁴²¹

338. On April 23, 2025—the day of Holocaust remembrance known as Yom HaShoah ("Day of the Shoah")—AMP and NSJP's protestors escalated their violence and disruption. AMP and NSJP joined together with their AMP and NSJP chapters and affiliates at Yale in organizing and mobilizing protestors to unlawfully blockade the building where the lecture was scheduled,⁴²² Ben-Gvir's car,⁴²³ and the roads around the building,⁴²⁴ interfering with students and visitors' freedom of movement and with law enforcement operations in the same manner that NSJP's

⁴¹⁹ Palestine Solidarity Working Group (@palestineswg), Instagram, <https://www.instagram.com/reel/DIxVT70xg6y/> (Apr. 22, 2025).

⁴²⁰ Michael Starr, Yale anti-Israel encampment reestablished to protest Ben-Gvir visit, The Jerusalem Post (Apr. 23, 2025), <https://www.jpost.com/breaking-news/article-851163>.

⁴²¹ Jessica Costescu, *Yale Derecognizes Students for Justice in Palestine Chapter After Group Blocks Jewish Students' Access to Parts of Campus*, The Washington Free Beacon (Apr. 23, 2025), <https://freebeacon.com/campus/yale-derecognizes-students-for-justice-in-palestine-chapter-after-group-blocks-jewish-students-access-to-parts-of-campus/>.

⁴²² American Muslims for Palestine: Connecticut (@ampalestinect), Instagram, <https://www.instagram.com/ampalestinect/reel/DIzphQksLVJ/> (Apr. 23, 2025).

⁴²³ Alexa Blair Wilkinson (@alexabwilkinson), Instagram, <https://www.instagram.com/alexabwilkinson/reel/DIzywt9Sj94/> (Apr. 23, 2025).

⁴²⁴ American Muslims for Palestine: Connecticut (@ampalestinect), Instagram, <https://www.instagram.com/ampalestinect/reel/DIz4Ugbsaf3/> (Apr. 23, 2025).

chapters and affiliates had done at the CUNY encampment on April 25, 2024, and at the Hamilton Hall takeover at Columbia on April 30, 2024. AMP and NSJP's protestors openly declared their support for Hamas, wearing Hamas headbands⁴²⁵ and chanting Hamas and NSJP slogans about engaging in Intifada: "There is only one solution—Intifada revolution!" and "Mobilize the Intifada!"⁴²⁶ The protestors shouted at and denigrated visibly-Jewish students who went to attend the lecture⁴²⁷ and threw objects at them as they left.⁴²⁸ The AMP and NSJP protestors also threw objects at Ben-Gvir as he left the event after his lecture.⁴²⁹ AMP joined its and NSJP's Yale chapters and affiliates in celebrating the attack on Ben-Gvir with thrown objects, proudly posting photos of Ben-Gvir and his security team reacting to the thrown objects with zoomed-in pictures showing the objects flying near Ben-Gvir's head.⁴³⁰ When police arrested AMP and NSJP's protestors for violent and unlawful conduct, AMP and NSJP immediately leapt into action to defend them and spread false propaganda narratives that they were being punished for engaging in protected speech acts,⁴³¹ just as AMP and NSJP have consistently done with many prior violent acts by their chapters and affiliates, including the riots by NSJP's CUNY and Columbia chapters on April 30, 2024.

339. On April 24, 2025, following the momentum of AMP and NSJP's creation of the new Yale encampment, NSJP joined CUNY for Palestine and the New York City NSJP chapter in

⁴²⁵ @KassyAkiva, Twitter (Apr. 23, 2025 8:55 PM), <https://x.com/KassyAkiva/status/1915207930678223186>; @KassyAkiva, Twitter (Apr. 23, 2025 9:08 PM), <https://x.com/KassyAkiva/status/1915211177929421028>.

⁴²⁶ @KassyAkiva, Twitter (Apr. 23, 2025 6:16 PM), <https://x.com/KassyAkiva/status/1915168047007990091>.

⁴²⁷ @KassyAkiva, Twitter (Apr. 23, 2025 6:48 PM), <https://x.com/KassyAkiva/status/1915176090059866514>.

⁴²⁸ @NetanelCrispe, Twitter (Apr. 23, 2025 10:42 PM), <https://x.com/NetanelCrispe/status/1915234990549254387>.

⁴²⁹ Jerusalem Post Staff, *WATCH: Pro-Palestinian protesters throw water bottles at Ben-Gvir after Yale speech*, The Jerusalem Post (Apr. 24, 2025), <https://www.jpost.com/breaking-news/article-851308>.

⁴³⁰ American Muslims for Palestine: Connecticut (@ampalestinect), Instagram, https://www.instagram.com/p/DI0FaqvSrZD/?img_index=1 (Apr. 23, 2025).

⁴³¹ American Muslims for Palestine: Connecticut (@ampalestinect), Instagram, https://www.instagram.com/ampalestinect/reel/DIz_rcZMc1q/ (Apr. 23, 2025).

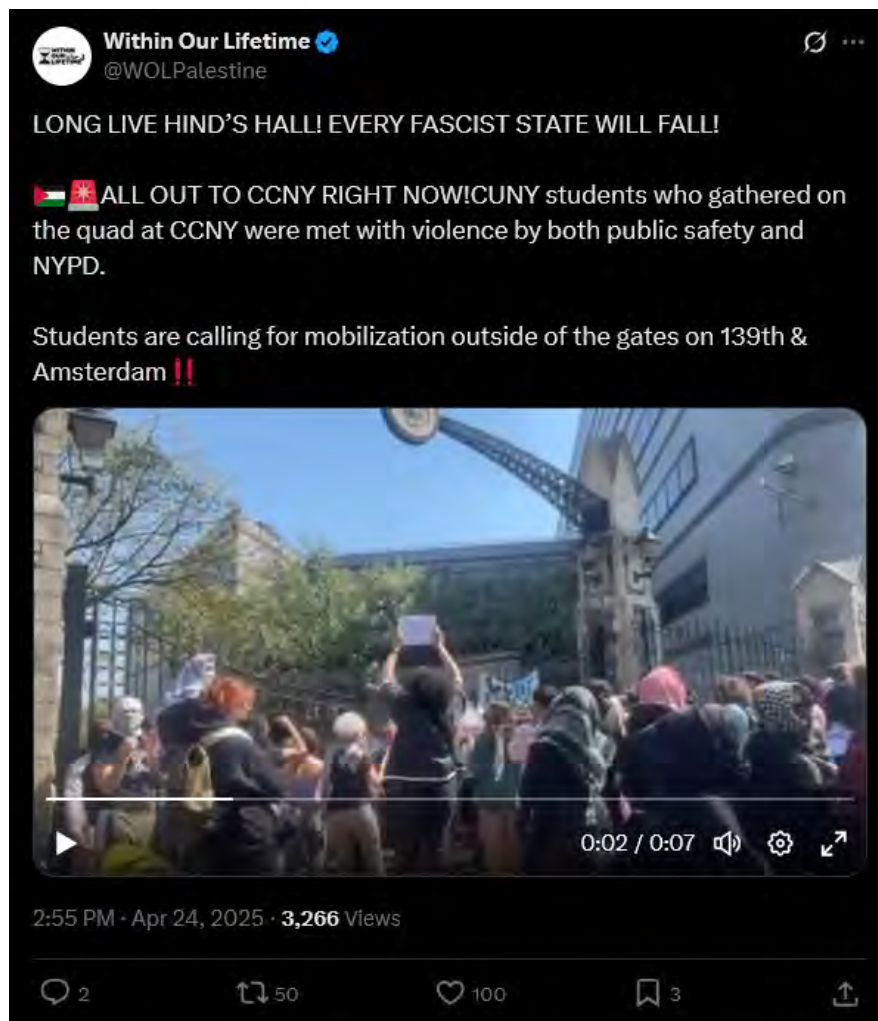
organizing and announcing the creation of a new encampment at the CCNY campus.⁴³² The new encampment occupies the same location as the first encampment where NSJP protestors beat Horowitz for carrying an American flag. NSJP and its chapters made their violent intent clear, stating that they “follow in the lead of Palestine and the resistance [i.e., Hamas]” and that “escalated resistance is a responsibility, a duty, and a necessity.” The demands of this new encampment are the same as the demands of the encampment in April 2024 where Horowitz was attacked.



⁴³² NYC Students for Justice in Palestine (@nyc.sjp), Instagram, https://www.instagram.com/nyc.sjp/p/DI1n74yO6mj/?hl=en&img_index=1 (Apr. 24, 2025).

340. CUAD joined NSJP and CUNY for Palestine with its own call to mobilize reinforcements to NSJP's new encampment at CCNY, declaring, "ALL OUT TO CCNY. PALESTINE WILL NEVER DIE!"⁴³³

341. AMP and NSJP's pro-Hamas ally/subdivision, Within Our Lifetime, also joined in mobilizing protestors to the new CUNY encampment, connecting the new CUNY encampment to the building seizures and riots at CUNY and Columbia on April 30, 2024—"LONG LIVE HIND'S HALL! EVERY FASCIST STATE WILL FALL!"⁴³⁴



⁴³³ @ColumbiaBDS, Twitter (Apr. 24, 2025 1:58 PM), <https://x.com/ColumbiaBDS/status/1915465376252539363>.

⁴³⁴ @WOLPalestine, Twitter (Apr. 24, 2025 2:55 PM), <https://x.com/WOLPalestine/status/1915479737910071756>.

342. AMP and NSJP's new encampment at CCNY appears to be a coordinated operation among NSJP's New York City area chapters, with NSJP's chapters and affiliates at New York University and Cooper Union joining the Columbia chapters and affiliates in mobilizing to reinforce the encampment.⁴³⁵

343. As demonstrated by AMP and NSJP's continued role ringleading and providing resources, propaganda, and defense for violent, illegal, and disruptive conduct by AMP and NSJP's chapters and affiliates—including a relaunched CUNY encampment that is currently ongoing—AMP and NSJP have been and continue to be systematically involved in violent wrongdoing by NSJP's chapters and affiliates, particularly at CUNY and Columbia. Accordingly, AMP and NSJP are so systematically involved in and responsible for NSJP's chapters and affiliates' operations, including those at CUNY and Columbia, that they are liable for all wrongful acts by those chapters, including the assault and battery against Horowitz by NSJP's chapters and affiliates at the CUNY encampment.

* * *

344. As a result of the assault on Horowitz by the NSJP protestors at the CUNY encampment—which was perpetrated in furtherance of AMP and NSJP's plans to violently take over and disrupt the CCNY campus and which AMP and NSJP aided and abetted by materially supporting the violence of the encampment with orders, training, guidance, resources, encouragement, and propaganda cover—Horowitz suffered physical, mental, and monetary harm that continues to this day.

⁴³⁵ @owsspawg, Twitter (Apr. 24, 2025), <https://x.com/owsspawg/status/1915478131923702009>.

COUNT I

Aiding and Abetting Assault and Battery

345. Plaintiff Horowitz realleges and reincorporates paragraphs 1-344.

346. Protestors belonging to and associated with non-parties NSJP's CUNY and Columbia chapters and affiliates and the encampment they created at CUNY, under AMP and NSJP's orders and with AMP and NSJP's assistance and involvement, assaulted and battered Horowitz, causing him extensive physical, mental, and monetary damages.

347. AMP and NSJP aided and abetted the violent assault and battery against Horowitz by providing knowing and systematic material assistance to violent, criminal wrongdoing perpetrated by NSJP's chapters and affiliates generally and by NSJP's chapters and affiliates in the CUNY encampment in particular; the attack on Horowitz was a foreseeable and direct consequence and extension of this assistance.

348. AMP and NSJP so pervasively and systematically assisted NSJP's CUNY and Columbia chapters and affiliates, in general and with the CUNY encampment in particular, as to render them liable for those chapters and affiliates' every act of violence, criminality, and wrongdoing in relation to the CUNY encampment.

349. On information and belief, AMP and NSJP, both explicitly and implicitly, through their actions and inactions, authorized or ratified all the wrongdoing committed by NSJP's chapters and affiliates, including NSJP's CUNY and Columbia chapters and affiliates in their attack on Horowitz.

350. Accordingly, AMP and NSJP are liable to Horowitz for aiding and abetting the assault and battery perpetrated against him and are thus liable for his resulting physical, mental, and monetary damages.

COUNT II

Civil Conspiracy to Commit Assault and Battery

351. Plaintiff Horowitz realleges and reincorporates paragraphs 1-344.

352. AMP, NSJP, and non-parties NSJP's CUNY and Columbia chapters participated in a conspiracy to commit tortious and unlawful acts to disrupt the CCNY and Columbia college campuses in service of AMP and NSJP's pro-Hamas mission. This conspiracy caused harm to Horowitz when protestors from NSJP's CUNY and Columbia chapters assaulted and battered him at the CUNY encampment in furtherance of the conspiracy's plan of violently occupying and disrupting the CCNY campus.

353. Defendants AMP and NSJP entered an agreement with NSJP's CUNY and Columbia chapters and affiliates to disrupt their campuses through unlawful acts of property destruction, violence, and resistance against law enforcement as part of AMP and NSJP's operations in support of Hamas. This agreement is demonstrated by AMP and NSJP's close working relationship with NSJP's CUNY and Columbia chapters leading up to and following the attack on Horowitz, including but not limited to the following evidence:

- The CUNY chapters and affiliates' direct role in developing mutual defense pledges with AMP and NSJP that AMP and NSJP used to coordinate NSJP's chapters and affiliates in perpetrating violent, unlawful, and rules-violating disruptions on their campuses;
- The violent Columbia chapters and affiliates' role as a model that AMP and NSJP encouraged other NSJP chapters and affiliates to emulate;
- AMP and NSJP's direct involvement in organizing a terrorism indoctrination seminar featuring PFLP terrorists for the Columbia chapters and affiliates' members;

- AMP and NSJP's direct declaration in The Written Resistance that the purpose of the encampments was to overthrow schools and the West and force them to submit to AMP and NSJP's demands;
- The Columbia chapters and affiliates' role as the spearhead for the encampment operation by creating the operation's first unlawful, violent encampment under AMP and NSJP's direction;
- AMP and NSJP's role in ordering, organizing, and assisting the Columbia and CUNY chapters and affiliates with the creation of the first and second Columbia encampments;
- AMP, NSJP, and the CUNY chapters and affiliates' role in organizing supplies and reinforcements to the Columbia chapters and affiliates' encampments to aid them in unlawfully occupying the Columbia campus and violently resisting school security personnel and law enforcement and attacking and harassing innocent bystanders;
- The CUNY chapters and affiliates' role in organizing academic boycotts in support of the Columbia chapters and affiliates' first unlawful encampment;
- AMP's Executive Director, Osama Abuirshaid, visiting the Columbia encampment the day before the CUNY encampment was established and less than a week before the April 30th riots, praising the encampment and encouraging its organizers to continue to "fight" following their violent and antisemitic reign of terror on Columbia's campus;
- AMP, NSJP, and the Columbia chapters and affiliates' role in organizing supplies and reinforcements to the CUNY chapters and affiliates' unlawful encampment to aid them in unlawfully occupying the CCNY campus and violently resisting school security personnel and law enforcement and attacking and harassing innocent bystanders;

- AMP and NSJP’s role in organizing and mobilizing reinforcements for the riots that the CUNY and Columbia chapters and affiliates coordinated on their campuses on April 30, 2024;
- AMP and NSJP’s direct support for unlawful and violent action by the CUNY and Columbia chapters and affiliates—including the riots of April 30th—by engaging in knowingly false propaganda campaigns defending their actions and organizing protests to protect their members from legal and disciplinary consequences for shutting down school operations, trespassing, causing millions of dollars in damage from vandalism and property destruction, attacking innocent bystanders and law enforcement and school security personnel, and violently resisting arrest;
- The continued close collaboration between AMP, NSJP, and the CUNY and Columbia chapters and affiliates following the riots of April 30, 2024, including direct coordination on multiple further disruptive protest campaigns in support of unlawful conduct by the chapters and affiliates.
- The currently ongoing collaboration between AMP, NSJP, and the CUNY and Columbia chapters and affiliates in relaunching the CUNY encampment to impose the same demands on CUNY as the first encampment at which NSJP protestors attacked Horowitz.

354. Horowitz was injured by an unlawful overt act by NSJP’s CUNY and Columbia chapters and affiliates when their members occupying the unlawful CUNY encampment mobbed and beat him in “defense” of the encampment, perceiving him as an enemy, target of opportunity, or an obstacle to their unlawful control over the campus.

355. The attack on Horowitz was done pursuant to and in furtherance of the common scheme by AMP, NSJP, and the CUNY and Columbia chapters and affiliates to unlawfully and violently occupy the CCNY and Columbia campuses in service of AMP and NSJP's pro-Hamas mission.

356. As a result of the violent attack on Horowitz done in furtherance of this conspiracy, Horowitz suffered significant physical, mental, and monetary damages for which Defendants AMP and NSJP are liable.

JURY TRIAL DEMANDED

Plaintiff Horowitz hereby demands a jury trial for all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Horowitz prays and requests that a judgment be entered in his favor and against Defendants awarding him:

- a) Compensatory, consequential, and punitive damages in amounts to be determined at trial;
- b) Pre-judgment interest and post-judgment interest at the maximum rate allowable by law; and
- c) Such other and further relief as the Court deems just and proper.

Dated: April 24, 2025

Respectfully submitted,

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